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DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
SAN FRANCISCO AREA OFFICE
ONE EMBARCADERO CENTER, SUITE 1600
SAN FRANCISCO, CALIFORNIA 94111

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TO: INDIVIDUALS AND AGENCIES

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SUBJECT: FINAL ENVIRONMENTAL IMPACT STATEMENT
MEI LUN YUEN DEVELOPMENT OF THE CHINATOWN
REDEVELOPMENT AREA IN SAN FRANCISCO, CALIFORNIA

Attached is the Final Environmental Impact Statement for the Mei Lun Yuen Development of the Chinatown Redevelopment area in San Francisco, California, for your review and comment in accordance with Section 102(2)(C) of Public Law 91-190 (U.S.C. Section 4332) and implementing Federal regulations.

The Draft EIS on this Project was circulated to individuals and agencies on September 27, 1976. A total of 1,871 letters were received, including thirty which arrived after the deadline. Well over 1800 of these letters were in favor of the Project and did not raise any issues requiring a response. All letters were considered and together with consultations with the San Francisco City Planning Department and the San Francisco Redevelopment Agency, a number of mitigation improvements and modifications have been incorporated into this Final EIS. All agency and organizational letters, all individual letters appropriate for direct response, and a number of interesting and standard format letters are reproduced in this Final EIS, together with HUD responses in those cases where required. This approach is to enable all parties to review HUD comments and is in lieu of individual communications to respondents.

Your comments are invited on the attached Final EIS. Such communications must be received within thirty (30) days from the date of this letter and will be carefully considered in the HUD decision and refining of the Project as articulated in the Final EIS.

Copies of this Final Environmental Impact Statement are available for reading by the public at the information centers of the HUD San Francisco Area Office at One Embarcadero Center, San Francisco, the HUD Regional Office at 450 Golden Gate Avenue, San Francisco and the main branch of the San Francisco Public Library Documents Section.

D

REF
711.4097
M475f

Your comments on this Final Environmental Impact Statement should be addressed directly to:

Mr. George B. Adams
Environmental Staff, 9.1SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111
(415) 556-6642

Sincerely,

James H. Price
Area Director

Enclosure

REF 711.4097 M475f

Mei Lun Yuen development
of the Chinatown
[1976]

SUMMARY SHEET

STATUS: ( ) Draft (X) Final

SUBJECT: Mei Lun Yuen Development of the Chinatown Redevelopment Area in San Francisco, California

Name of Responsible Federal Agency:

U. S. Department of Housing and Urban Development
San Francisco Area Office
One Embarcadero Center, Suite 1600
San Francisco, California 94111

1. Name of Action: (X) Administrative ( ) Legislative

2. Brief Description of Action:

   Redevelopment of parcel into a highrise elderly apartment house containing 140 units with 10,000 square ft. retail commercial space at ground level: 35 family flats in four buildings; and a five-story commercial parking garage.

3. Summary of Environmental Impacts and Adverse Environmental Effects:

   No major adverse impacts. Minor impacts include partial blocking of some views of the Bay, some noise pollution, air pollution and loss of open space.

4. Alternatives Considered:

   Market rate housing, commercial/hotel development, open space/park development, alternative locations and site and/or design modification.

5. All Federal, State and Local Agencies from which Comments have been Requested:

   See Appendix A

6. Date Statements Made Available to CEQ and Public:

   Draft: September 27, 1976

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61 SF 05/02/97 531-

HUD-R09-EIS-1976-9F

FINAL ENVIRONMENTAL IMPACT STATEMENT
MEI LUN YUEN DEVELOPMENT
OF
THE CHINATOWN REDEVELOPMENT AREA
IN
SAN FRANCISCO, CALIFORNIA

Prepared by:

San Francisco Area Office
U. S. Department of Housing and
  Urban Development
Environmental Staff
One Embarcadero Center, Suite 1600
San Francisco, California 94111

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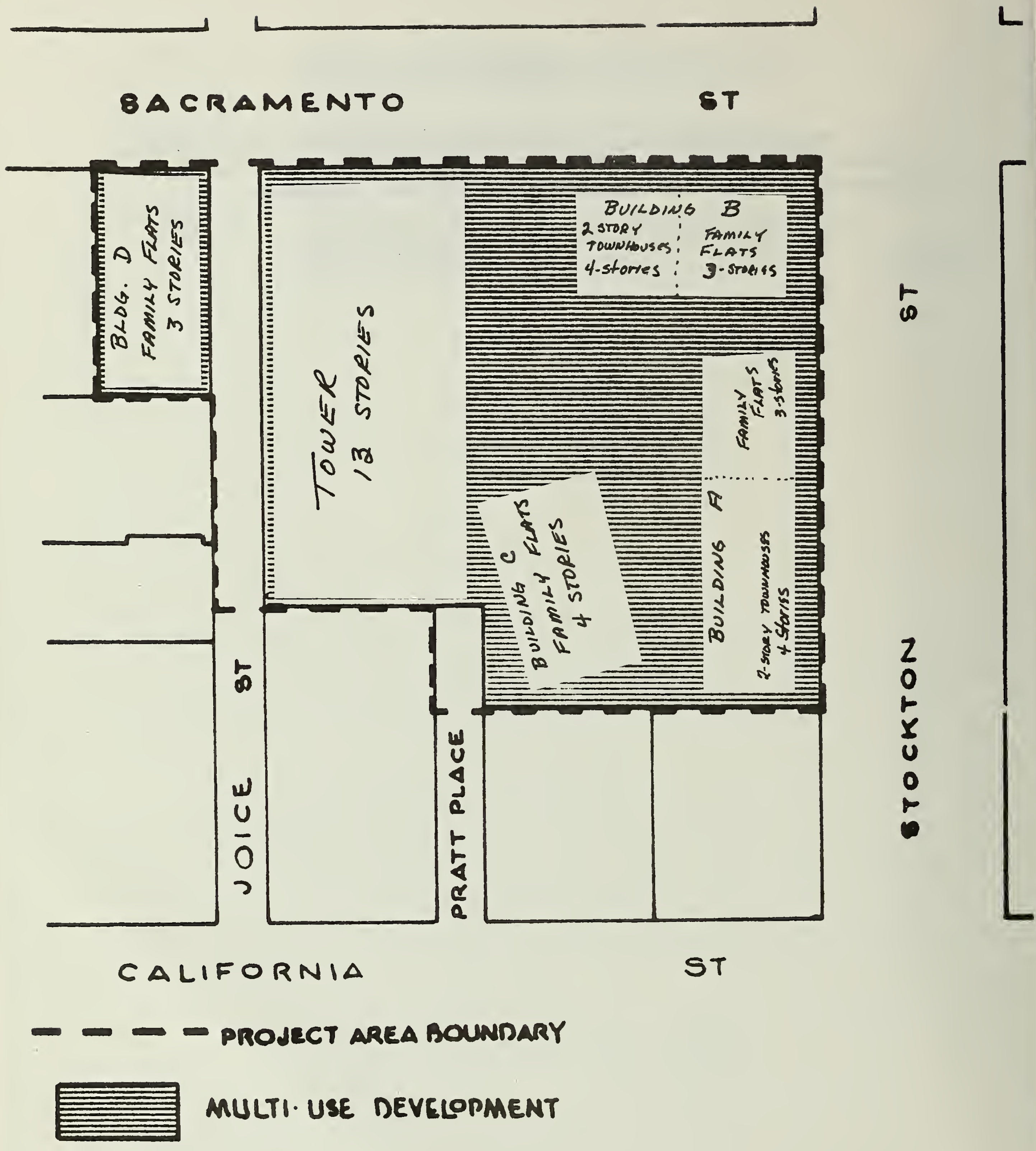
ERRATA

As a result of rewriting the Draft EIS to produce the Final Environmental Impact Statement pages 9 and 26 were eliminated. In the interests of time, the remaining pages were not renumbered.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PRATT PLACE
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BUILDING B
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FAMILY FLATS 3-STORIES
FAMILY FLATS 3-stories
BUILDING A
2-STORY TOWNHOUSES 4 Stories
BUILDING C FAMILY FLATS 4 STORIES
PROJECT AREA BOUNDARY
▤ MULTI-USE DEVELOPMENT
N
0 FEET 80

ILLUSTRATIVE BUILDING LOCATIONS

(NOT DRAWN TO SCALE)

PROJECT DESCRIPTION

Mei Lun Yuen is the "Project" and is a proposed residential development with a parking garage and some commercial retail space as ancillary land uses. The Project is to be constructed in the Chinatown Urban Renewal Area which consists of a portion of the block bounded by California, Powell, Sacramento and Stockton Streets in San Francisco, California. (See map opposite). This block is situated between the City's Chinatown Core and Nob Hill areas and near the edge of the Financial District. The Project has the same boundaries as the Chinatown Urban Renewal Area.

The residential portion of the Project will provide 175 living units in five buildings. There will be 140 elderly units (25 efficiency and 115 one-bedroom) in a thirteen-story reinforced concrete building and thirty-five 2,-3, and 4-bedroom family units in four 4-story wood-frame buildings. It will be financed under Section 236 of the National Housing Act (as amended). See Appendix C for an explanation of the Section 236 program.

A five-story commercial garage will first be constructed on the eastern portion of the property. The uppermost ceiling slab of the garage will also serve as a platform upon which three of the family-unit buildings will be constructed. Thus, the three family-unit buildings will be situated on air-rights over the garage. (The air-rights will be owned by the sponsor). This garage will also contain 10,000 to 15,000 square feet of specialty retail commercial space facing onto Stockton Street which is expected to serve the residents of the Project as well as residents of the surrounding neighborhood.

The sponsor of this Project is The Presbyterian Church In Chinatown. The developer is Arcon, Inc. of San Francisco.

There will be two parking areas reserved for exclusive use of the residents in the Project: a) two floors of parking below the tower building and b) a parking area under one of the family-unit buildings which will be located on the 3,280 square-foot parcel situated west of Joice Street behind the residential tower.

In early 1972 when this site was designated an urban renewal area, it contained eleven old residential structures with a total of 47 living units, and a surface parking lot. Seven of these structures were substandard to a degree warranting clearance and the remainder had city code deficiencies.

Since that time, the San Francisco Redevelopment Agency has acquired the real property in the Project area through purchase and eminient domain proceedings. Upon completion of the relocation program under Federal, State and local regulations, the Agency began the process of clearing and preparing the site for sale to the developer. When the process is complete, the Agency will have consolidated all the former lots into one parcel and it will then convey the site, cleared of all structures and trees, to the sponsor. The sponsor. The sponsor (non-profit) will then start Project development. Ownership of the Project will be:

for the highrise dwelling structure and a couple of small lots in fee simple to the nonprofit owner; the area beneath the platform to Arcon, Inc., subject to reservation of air rights; the air rights reserved from Arcon will be conveyed from the Agency to the non-profit owner.

Pending Zoning Reclassification Applications

The Chinatown Redevelopment Area is included within an area subject to a pending application for zoning reclassification with respect to height limitations. This pending application requests a height limitation of 105 feet or 88 feet. In addition, the Redevelopment Area is within an area that has been formally proposed for reclassification as a PR (Planned Residential) District pursuant to the recent Residential Zoning Study being conducted by the Department of City Planning. This proposed reclassification action took place on October 28, 1976.

The Redevelopment Plan has been approved by the Board of Supervisors and is in conformity with San Francisco's Master Plan. The City's Zoning Ordinance (City Planning Code) shows the site to be currently zoned R-5 and C-3-G which would allow the 160-foot tower.

However, the San Francisco Planning Code would prohibit the issuance of a building permit for any development in excess of 88 feet - the most restrictive height of the application for zoning reclassification for one year from the date the application was submitted (February 1976).

It is the Planning Commission's belief that the height limit issue should be resolved prior to the expiration of the year and it has been calendered for the second week of January 1977.

HUD believes that the Planning Commission and the Board of Supervisors will choose to honor the Cooperation Agreement between the City and County of San Francisco and the San Francisco Redevelopment Agency wherein the City agreed to "make the necessary changes in zoning use districts within the Project so as to conform to the land use and development standards provided in the Plan." (A copy of the Resolution and Cooperation Agreement follows this discussion).

In any event, HUD's decision whether or not to approve the Project as proposed must be made prior to the sponsor's preparation of the final plans and their submission to the City. Thus, it is necessary that this EIS be prepared and circulated at this time so that HUD may make a fully informed decision as required by Federal statute.

RESOLUTION NO. 125-74
(Adopted May 13 , 1974)

APPROVING PROPOSED FORM OF COOPERATION AGREEMENT BETWEEN THE REDEVELOPMENT AGENCY AND THE CITY AND COUNTY OF SAN FRANCISCO IN CONNECTION WITH THE STOCKTON/SACRAMENTO REDEVELOPMENT PROJECT AREA, AND AUTHORIZING EXECUTION THEREOF.

RESOLVED by the San Francisco Redevelopment Agency that the form of Cooperation Agreement, a copy of which is attached hereto, be and the same is hereby approved; and, be it further

RESOLVED that the Chairman and the Secretary of the Redevelopment Agency be and they are hereby authorized to execute on behalf of the Agency a Cooperation Agreement with the City and County of San Francisco substantially in the form attached hereto.

APPROVED AS TO FORM:

Henry F. Davis
Agency General Counsel

RECEIVED
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SAN FRANCISCO
1974 MAY 31 PM 4:32
BY

COOPERATION AGREEMENT
(Stockton/Sacramento Redevelopment Project)

THIS AGREEMENT made and entered into this 18th day of June, 1974, by and between the Redevelopment Agency of the City and County of San Francisco (hereinafter called the "Agency") and the City and County of San Francisco, a municipal corporation (hereinafter called the "City"),

WITNESSETH:

WHEREAS, the Agency is a public body, corporate and politic, created by the Community Redevelopment Law (Health and Safety Code of California, Division 24, Part 1, Chapter 4, Article 1) and is transacting business and exercising powers granted by said Community Redevelopment Law by virtue of Resolution No. 7779 (Series of 1939) duly and regularly adopted by the Board of Supervisors of the City and County of San Francisco on the 9th day of August, 1948, and approved by the Mayor of said City on the 10th day of August, 1948; and

WHEREAS, the Agency with the aid and cooperation of the City has undertaken and is carrying out a redevelopment program in the City and County of San Francisco in accordance with the Community Redevelopment Law; and

WHEREAS, the Agency proposes in the redevelopment of the so-called Stockton/Sacramento Redevelopment Project (hereinafter called the "Project Area") to acquire such property and improvements therein as more particularly set forth and described in the Redevelopment Plan for the Stockton/Sacramento Redevelopment Project approved and adopted by the Board of Supervisors of the City and County of San Francisco by Ordinance No. 250-74 on 6/6/74; and

WHEREAS, surveys and studies of said Project Area disclose that the area is characterized by conditions of blight which include residential buildings unfit and unsafe for occupancy, overcrowded dwelling units, inadequate facilities for parking, under-utilization of land, unimproved streets and land accessible only from an unimproved street, and parcels of inadequate size. These conditions constitute a substandard living environment and have a detrimental effect on the neighborhoods surrounding the Project Area; and

WHEREAS, pursuant to Section 33367 of the Health and Safety Code of California said Project Area is and has been found by the Board of Supervisors to be a blighted area within the meaning of Sections 33031-33034 of said Health and Safety Code; and

WHEREAS, the Agency has prepared a redevelopment plan for the Project Area, which plan has been duly and regularly approved by the Board of Supervisors of said City and all acts, proceedings and things required to have been had, done, found, and determined prior to or in connection with the preparation and approval of such Redevelopment Plan have, in due time and manner been had, done, found, and determined appropriately by the Agency, Planning Commission, and the City; and

WHEREAS, the Agency proposes to enter into one or more contracts with the United States of America, acting by and through the Department of Housing and Urban Development, and thereby obtain Federal financial assistance under Title 1 of the Housing Act of 1949, as amended, in the form of:

(1) A loan, or loans, in an amount equal to the cost of acquisition, clearance and demolition of structures from that portion of the Project Area as set forth and described in the Plan, the rehabilitation activities contemplated by said Plan, and the construction of such site improvements as may be necessary to carry out said Plan; and

(2) A Federal capital grant to enable the Agency to make the land in said Project Area available at its fair value for uses in accordance with the Plan, which Federal capital grant may be in an amount which does not exceed two-thirds of the aggregate net costs of such project, and which Federal capital grant will be payable if the remaining one-third of such costs is provided by the City in the form of "local grants-in-aid" consisting of either, or a combination of:

    (a) Cash grants,
    (b) Donations of land, demolition or removal work, site improvements in the Project Area, or
    (c) The provision of parks, public buildings or other facilities necessary to serve and support the new uses of land in the Project Area; and

WHEREAS, upon acquisition and rehabilitation or clearance of the property and the preparation of the Project Area for uses in accordance with said Redevelopment Plan, the Agency will dispose of the land in the Project Area after public hearing for the purpose of such redevelopment to redevelopers who may be persons, partnerships, or public or private corporations or agencies, and may be organized as non-profit or profit-making organizations;

NOW, THEREFORE, in consideration of the mutual covenants hereinafter set forth, the Agency and the City, subject to the availability of Federal financial assistance to the extent described in the Redevelopment Plan, agree:

(1) The Agency agrees to proceed diligently and forthwith with all necessary actions, work, and undertakings to carry out the redevelopment of said Stockton/Sacramento Redevelopment Project Area, and that it will make application for a contract or contracts, with the United States of America, acting by and through the Department of Housing and Urban Development for a loan or loans, and a capital grant available and authorized under Title 1 of the Housing Act of 1949, as amended, in amounts which, together with the local grants-in-aid herein provided for, shall be sufficient to carry out the Project.

(2) The Agency agrees upon request of the Board of Supervisors to render such reports as said Board may require concerning the progress and execution of the Redevelopment Plan for the Stockton/Sacramento Redevelopment Project Area.

(3) The Agency agrees to use the services and facilities of the City, its departments and offices, to such extent and upon such terms as may be agreeable to the Agency and the City office or department concerned in the execution of the Redevelopment Plan for the Stockton/Sacramento Redevelopment Project Area.

(4) The City agrees, subject to such action as may be required by law and fiscal provisions of its Charter, to provide local grants-in-aid in connection with such Project in an amount not less than one-third of the net project cost of the Project, which cost is estimated to be $789,954. In the event the local grant-in-aid credits specified in said Part IV, Section B of the Redevelopment Plan are available, such credits may be applied to the one-third share of the net project cost of the City and County of San Francisco. Any local grant-in-aid credits generated by this Stockton/Sacramento Project shall be applied to the one-third share of the net project cost of the City and County of San Francisco for this project.

(5) The City agrees to assist and cooperate with the Agency in effecting the Redevelopment Plan.

It is recognized that the estimates regarding the disposition of land acquired by the Agency and the estimated costs of site improvements may be subject to further revision. In the event that the local grants-in-aid are not equal to one-third of the net project cost of said Project, the City, subject to its fiscal laws, agrees to provide such additional local grants-in-aid to not less than one-third of the net project cost thereof.

(6) The City further agrees that subject to applicable law and the policies and procedures established under its Charter and existing codes and regulations, it will aid and cooperate in the undertaking of the Project by:

  (a) Institute proceedings for the vacating or other necessary modifications of the street layout including the alterations and improvements of streets outside the Project as deemed necessary to implement the street pattern within the Project as delineated in the Redevelopment Plan.

  (b) Convey vacated street areas (except those contemplated for retention for other public use) to the Agency without cost.

(c) Institute proceedings necessary for changes or improvements in publicly-owned public utilities within or affecting the Project.

(d) Make the necessary changes in zoning use districts within the Project so as to conform to the land use and development standards provided in the Plan.

(7) The City further agrees with respect to each and every public facility which may be provided or furnished by it under this Agreement that such public facilities shall be open without regard to race, color, creed, or national origin to all occupants of the Project Area after redevelopment and if such facilities are provided on Project Area land acquired from the Agency, to all others.

IN WITNESS WHEREOF, the City has caused this agreement to be executed by its Mayor and the Clerk of the Board of Supervisors pursuant to Resolution No. 369-74 of said Board, a copy of which is attached hereto; and the Agency has caused this Agreement to be executed by its Chairman pursuant to its Resolution No. 124-74 the day and year first above written.

CITY AND COUNTY OF SAN FRANCISCO, a
municipal corporation

By Joseph L. Alioto
Mayor

ATTEST:

Clerk of the Board of Supervisors

APPROVED AS TO FORM:

Thomas M. O'Connor
City Attorney

By Robert A. Kenealey
Deputy City Attorney

REDEVELOPMENT AGENCY OF THE CITY AND COUNTY
OF SAN FRANCISCO, a public body corporate
and politic

By Walter F. Kaplan
Chairman

ATTEST:

By Helen L. Sause
Assistant Agency Secretary

SAN FRANCISCO DEPARTMENT OF CITY PLANNING 100 LARKIN STREET · SAN FRANCISCO, CALIFORNIA 94102

March 27, 1974

Mr. Robert Rumsey
Executive Director
San Francisco Redevelopment Agency
939 Ellis Street
San Francisco, California

RE: Zoning of Proposed Stockton/Sacramento Redevelopment Project Area; Lots 1,2, 3,4,5A,6,24,28,29,30,33,34,36 and 37 of Assessor's Block 243.

Dear Mr. Rumsey:

This is to confirm discussions with staff concerning the above matter.

The proposed redevelopment project area is currently partially zoned C-3-G (Lots 1,2, and 34), and partially zoned R-5 (Lots 3,4,5A,6,24,28,29, 30,33,36 and 37). It is quite possible that this existing zoning will allow the land uses contemplated by the proposed redevelopment plan, a mixture of residential and commercial uses. However, if that is not the case, this Department is prepared to recommend the zoning modifications necessary to conform to the land use and development standards provisions of the finally adopted redevelopment plan. Depending upon the nature of modifications required, this could entail zoning variances, planned unit development, or zoning reclassifications.

We concur that none of these modifications, even if necessary, should occur until after the land has been acquired by the Redevelopment Agency.

Sincerely yours,

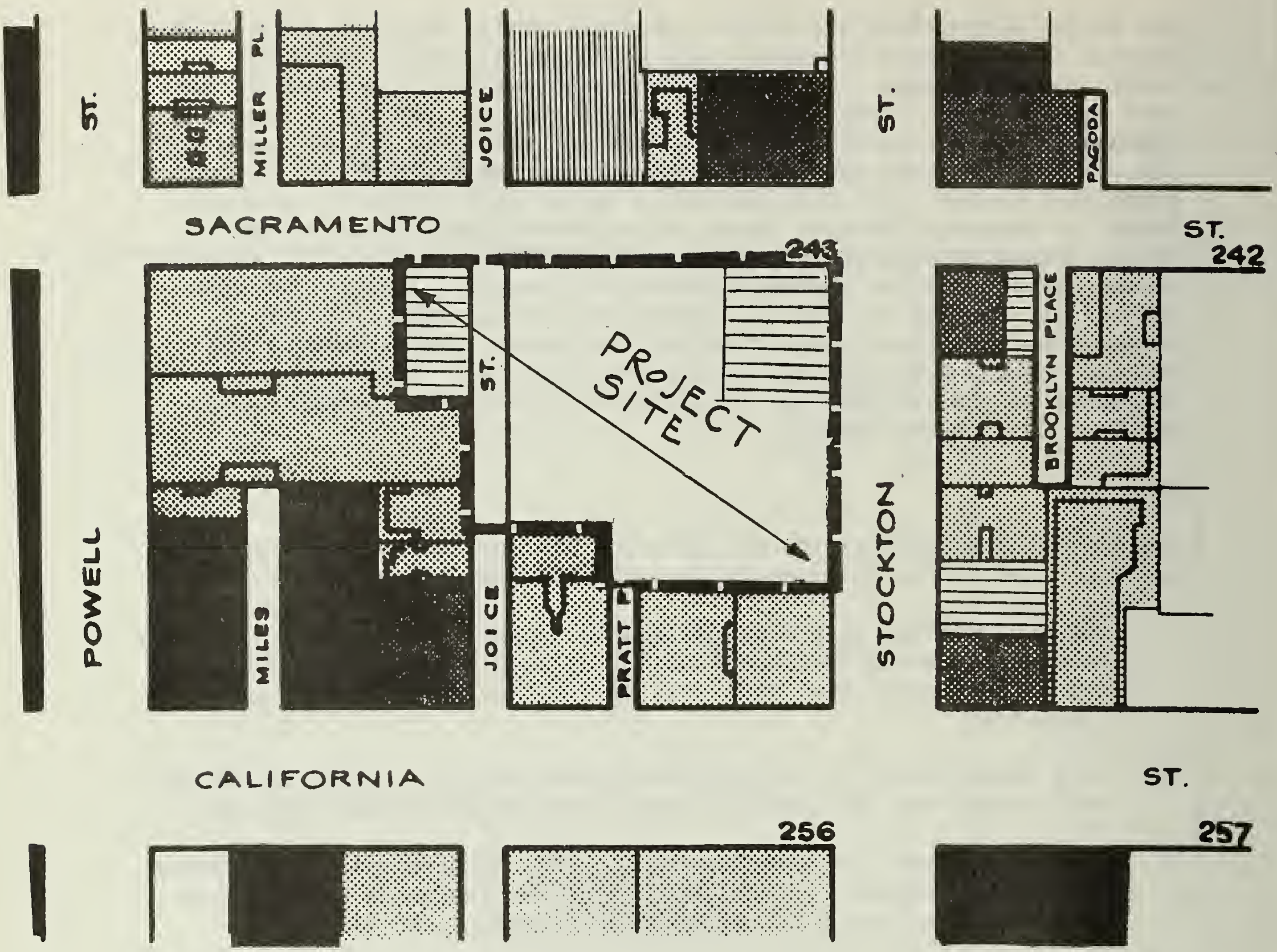
Allan B. Jacobs

Allan B. Jacobs,
Director of Planning

B

PART II

PROBABLE ENVIRONMENTAL IMPACTS


ST.
MILLER PL.
JOICE
ST.
PAGODA
SACRAMENTO
ST.
243
242
ST.
PROJECT SITE
BROOKLYN PLACE
POWELL
MILES
JOICE
PRATT
STOCKTON
CALIFORNIA
ST.
256
257

EXISTING LAND USE (GENERALIZED)

N
1" = 100'

- ▒ WHOLLY RESIDENTIAL
- ▓ PREDOMINANTLY RESIDENTIAL
- █ PREDOMINANTLY COMMERCIAL
- ▤ PARKING LOT
- ▥ SEMI-PUBLIC
- — — . PROJECT AREA BOUNDARY

MEI LUN YUEN PROJECT

& IMMEDIATE
VICINITY

7. Short Term Impacts: Construction of this Project will involve a number of items which will adversely affect the neighborhood and its residents. At the time of building permit application, the City Engineer's Office confers with representatives of the Municipal Railway System, Police Department, Traffic Engineer and the Bureau of Engineering to determine for the contractor, the parameters of operation. These include hours of operation, blockage of streets, site accesses, erection of barriers, dust control, use of cranes, and a variety of safety features. Blasting, if required, is subject to special review and approval for size and number of charges, placement on the site and times for setting them off, by the Director of Public Works. Hauling of excavated material off-site or of concrete and other materials on-site is controlled by the Vehicle Code and administered by the Police Department. Arrangements for special hours of operation, or special days (such as weekends when appropriate, as well as selection of special hauling routes are determined by the Police Department. The construction period is related to Project cost, and controlled by the Building Code. Requirements and limitations on these items are imposed upon the contractor by the responsible City Departments. Disruptions and general inconveniences are thus controlled, but obviously not eliminated, during the construction period allowed by the Building Code. These controls constitute the only plausible mitigation available, short of not constructing the Project at all.

TRAFFIC AND CIRCULATION

Traffic generation from the Project will be as follows:

1. Residential:

   City of San Francisco parking requirements for the Project are one space for each family unit and 1 for 7 elderly unit. Total required, and provided: 55. These will generate the following traffic, based on figures by the Transportation Section of the Department of City Planning.

   Family units: 6 to 7 daily trips per family = 210 to 245 trips

   Elderly units: 1 to 3 daily trips per unit = 140 to 420

   Total 350 to 665 trips per day

   The spread above is impractical for computation purposes. Therefore, for this analysis, an average, or 508 daily trips will be used, for the residential traffic generation. It is estimated that 75 of these trips will occur during the 5-6 p.m. peak hour, and half, or 254 will be during the 10 a.m. to 6 p.m. 8-hour period.

2. Commercial: 216 spaces are being provided. The city requires, for the commercial store area, 21 parking spaces. These will generate 5 trips per day, or 105 trips. Twenty of these will occur during the peak hour and the entire 105 will be during the 10 to 6 8-hour period.

   The remaining 195 spaces are to be rented out according to the sponsor's architect. City policy is to discourage commuters' use of such facilities, and encourage short term use in an effort to alleviate the severity of the parking shortage in this vicinity. The ratio of long term (all day) versus short term users is not known at this time and won't be until the garage has been in full operation for sometime. Therefore, for the purpose of this analysis, an arbitrary 50-50 proportion will be used. This means that 98 stalls will be for long term users, arriving and leaving during the 7-8 a.m. and 5-6 p.m. rush hours respectively.

The key factor in determining the amount of traffic generated by short term uses of the parking garage is the average time parked. This factor is unknown at this time, but our check with Portsmouth garage revealed that 2 hours is about the average there. Using this figure then would mean 4 turnovers during the 8-hour period of 10 a.m. to 6 p.m., or 4 x 98 = 392 one-way trips for the short term user.

The Project:

Preliminary plans for the Project indicate that the 55 residents' parking spaces will have both egress and ingress off Sacramento Street, as will the commercial spaces (from a second driveway), except that the latter will also have an ingress (but no egress) off Upper Stockton Street. The Architects have estimated, on a preliminary basis, that perhaps 50% of the "in" space vehicles will use Upper Stockton Street, and the other 50% Sacramento Street. The actual proportion is indeterminate at this time, and though important, is not as important as the fact that all cars will have to exit onto Sacramento Street, thereby adding traffic as discussed below.

Sacramento Street: This is a narrow street, 29 feet wide curb to curb. Parking is allowed along both sides and subject to towaway zones during 4-6 p.m. rush hour. During the day hours, there is but one effective lane of traffic, and during rush hours, there are three. Number 55 bus, (third busiest in San Francisco) runs westerly on this street (the street is one-way, westerly). These buses, together with existing driveways, a stop sign but no signalized intersection with Powell Street, and the steepness of the street (18% upgrade) are factors which limit the street's capacity to about 600 per hour, during the off-peak periods, and about 1080 during the morning and evening peak hours due to the towaway zones being in effect, according to the Redevelopment Agency's 1974 EIR on this project, and verified by the City's Transportation Section of the Department of City Planning.

Current traffic on this street averages approximately 4500 daily. On an hourly basis, traffic increases gradually from 106 vehicles/hr. at 8 a.m. to 446 between 4-5 p.m., and then drops off rapidly to less than 100 after midnight. The morning and evening peak hours vary greatly from 145 vehicles between 8 and 9 a.m., and 498 between 5 and 6 p.m.

Peak Hour Calculations:

Existing peak hour volume (5 to 6 p.m.) 498 vehicles

Project's Traffic:

Residential	75 vehicles	
Commercial Area*	20	
Short Term Parkers	49	
Long Term Parkers	98	242
		700 vehicles

* The short term parkers and the Commercial area figures both reflect short term use of the facility. They are separated here merely because, according to San Francisco Transportation Department, the traffic generation is 5 trips per parking apace for commercial development. Hence, 21 spaces x 5 = 105 daily trips, 20 of which will occur during the peak hour.

During the peak hour traffic, therefore, the volume/capacity ratio is 700/1080 or 65%, and will require no mitigation.

California Street:

This is a major street in San Francisco. It is 51' wide curb to curb, parking is allowed on both sides, with a towaway zone along its north side. Two cable-car lines in the middle of the street leave one lane of traffic in each direction. Private driveways with curb cuts are found along both sides of the street. The Redevelopment Agency has estimated its capacity to be 1000 vehicles in each direction, or 2000 total. This is well over the actual peak hour volumes of 1520 vehicles (665 eastbound, and 855 westbound) total. It therefore has excess peak hour capacity to the extent of nearly 500 vehicles.

Powell Street:

This is another major street in San Francisco, with the same characteristics as described above for California Street. No figures are available regarding its peak hour volumes, but our field observations indicate less traffic than on California Street, resulting also in an excess capacity situation of 500 or more vehicles during peak hours.

This street plays a major role in the Project's analysis because all Sacramento Street traffic must use it after observing the stop sign on Sacramento Street at Powell. All this traffic has three choices of direction--right turn toward Fisherman's Wharf, left turn toward Union Square, or across to continue on Sacramento, a one-way street westerly to Gough Street. The proportion of this split is unavailable from the City's Traffic Engineering Department, but our field observations indicate that most of the traffic turns on Powell Street. Since the project generated Sacramento peak hour traffic has been calculated at 242, and Powell Street excess capacity is nearly 500 vehicles, about 160 vehicles of the Sacramento Street traffic could turn on Powell Street and still be within the capacity limitations, and therefore not create an adverse impact upon this street.

Joice Street:

This is a narrow alley way, approximately 12' curb to curb in width, and carries an insignificant amount of traffic, not affecting the Project except for access by emergency vehicles.

Stockton Street (Lower):

The Project will not affect this street because no access/egress will be allowed from it. The street is 47' wide, curb to curb through the tunnel, and is divided in 3 lanes (2 northbound, and 1 southbound). No parking is allowed in the tunnel, but is allowed on both sides north of Sacramento Street. All Project-related traffic as well as all Sacramento Street traffic must come either from Stockton Street or from Sacramento Street east of Stockton. But because of Sacramento's one way pattern away from Stockton Street, none of the project's exiting traffic will affect it.

Stockton Street (Upper):

This street is only 1/2 block long north of California Street, and presently serves primarily as a parking area to residents of abutting apartment houses. The planned Project entrance off it will increase the traffic by the expected number of users, which has been estimated at some 50% of the "in" vehicles. This would result in about 84 vehicles during peak hour (half of the non-residential Project-related traffic). This would be a worst condition, occurring during the 5 to 6 p.m. peak hour, and would be considered a minor adverse impact requiring no mitigation.

Public Transportation:

Two bus lines (#30 on Stockton Street, and #55 on Sacramento Street), plus the cable cars on California and Powell Streets serve this area, thus providing public access to BART and virtually all parts of the City and beyond. According to the Director of Transportation for the Municipal Railway System, these existing facilities are able to serve an additional 10,000 patrons per day. The project will therefore have an insignificant impact on the public transportation system.

Impacts and Mitigation:

A. Long Term Impacts

1. Driveway location on Sacramento and Upper Stockton Streets will cause the permanent loss of approximately 8 parking spaces. Since the entire general area is in dire need of additional, rather than less parking, this impact is both adverse and of long term.

   Mitigation: The Project will provide 55 on-site parking spaces for its residents and 216 commercial parking spaces. This will far offset the loss of eight spaces.

2. The peak-hour Project-generated traffic is 242 vehicles from 5 to 6 p.m., bringing the total street traffic to 700. Since the towaway zones are in effect during this hour, freeing two additional lanes of traffic, the carrying capacity of the street for traffic other than busses is increased from 600 to approximately 1080 vehicles per hour, or 65% more than required during the 5 to 6 p.m. period. While additional traffic is considered a long-term adverse impact of the Project upon the environment, the effect of the towaway zones along Sacramento Street during peak hours provides adequate mitigation.

BIOTA

Present Environment

The 42,914 square foot site is land prepared for development and is characterized by a fairly steep grade of approximately 18%, rising from its base along Stockton Street up Sacramento to its termination forty feet or so above Joice Street.

The area surrounding the site is highly urbanized. An intensive walk back and forth across the site approximately 25 to 30 feet apart did not reveal any wildlife and only a bare minimum of plant life was noticed since the site has been graded and prepared for development. HUD contacted the staff of the Endangered Species Coordinator in the Regional Office of the California State Fish and Wildlife Service. They indicated that there were no known or suspected rare or endangered species of wildlife in or near the area of the proposed Project.

The weather is typical San Francisco moderate. The average annual mean temperature in 1975 was 55.8 degrees F. Frequent fog and westerly winds tend to keep the climate temperate.

Vegetation

Preliminary development plans of Omi Lang Associates, landscape architects, call for a total of 22,742 square ft. of outdoor landscaping, with 19,451 square ft. of this being open landscaping and 3,350 sq. ft. being on the roof garden tower. Thus, the long-term impact on the vegetation of the site should be positive.

Anticipated Impact

No negative impact is anticipated on the biota on this site as a result of this Project. The permanent effect should be positive, since the landscaping planned for the site will provide vegetation which will visually enhance the site while helping to prevent erosion and drainage problems.

HUD contacted the staff of the Regional Office of the Fish and Wildlife Service, U.S. Department of the Interior in Portland, Oregon who confirmed that there were no known or suspected rare or endangered plant species on the site.

EDUCATION

Under current busing policies of the San Francisco Unified School District (SFUSD) which have been established in an effort to achieve maximum integration, school age children from grades four on through high school are apt to be bused to all parts of the City. Thus enrollment figures for grades beyond the fourth in schools near the site have no significance in this analysis. The number of school children emanating from this Project would not necessarily have any effect on the secondary schools in the neighborhood, even if the number of children involved was much greater than it is. Thus the impact on only those schools serving children up to the fourth grade are discussed in this assessment.

It is estimated that the maximum number of school age children three to nine years old who may occupy the 35 family units (based on the number of bedrooms and the age distribution in the five census tracts including and surrounding the site in the 1970 Census of Population) would be 69. This maximum estimate of three to nine year olds assumes that the general age distribution of the population in the area has not changed significantly since 1970.

Existing Facilities

Elementary school age children in grades K-3 attend Commodore Stockton School at 950 Clay Street, one block away from the Project site. School enrollment at the end of February 1976 at Commodore Stockton was 758 children; capacity is 873 students.

There are several nursery schools operated by the SFUSD within a short distance of the Project: one, the Commodore Stockton Nursery and School Age Center at 949 Washington Street (serving children from two years through the third grade) had a June 1976 enrollment of 88 and a total capacity of 100. The Commodore Stockton Annex Nursery at 855 Sacramento Street for two to six year olds, had a June 1976 enrollment of 26 and a capacity of 34. Another, the Commodore Stockton Prekindergarten Center at 954 Washington Street has a capacity of 80 children one year prior to Kindergarten for three-hour sessions, part day.) In addition to these, there are a few private nursery schools, also one operated by the YWCA and two operated by the Economic Opportunity Council.

In general it may be said that all the educational facilities for young children in Chinatown are operating close to capacity.

The Chinese Educational Center operated by the SFUSD, with a capacity of 220 is a receiving center and elementary school for newcomers of all ages to prepare them for entry into a bilingual program or to school assignment. After September 1976 it will be located at 657 Merchant Street.

San Francisco, a highly urbanized and culturally rich city, has a wide range of eeucational resources available to its adult residents interested in continuing and expanding their education.

Conclusion:

Due to the minuscule increase in the school age population which will accrue from this development, no adverse effect on local educational facilities is anticipated.

AIR QUALITY

Existing air quality in the vicinity of the proposed Project is affected primarily by vehicular traffic throughout the surrounding area. The proposed Project will impact the existing air quality in the following ways:

- Vehicular traffic and its resulting exhaust emissions on Sacramento and Stockton Streets will be increased slightly due to project generated traffic;
- Exhaust emissions from the parking garage;
- Natural gas combustion for space heating and heating of hot water; and
- Construction activities.

Each of the above impacts is discussed in detail in the following paragraphs and is added to the existing concentrations of pollutants for comparison against Federal and State air quality standards. Conclusions are drawn and, where necessary, mitigating measures are recommended.

Emissions

Project-Related Vehicular Traffic on Streets

The Circulation/Transportation assessment indicates that the proposed project will generate an additional average daily traffic (ADT) of 1550 vehicles. This additional traffic is primarily along Sacramento and Stockton Streets and is the result of vehicles entering and leaving the parking structure which is a part of the proposed project. (NOTE: There is also an entry to the parking structure on Upper Stockton Street; however, traffic into the parking structure at this point is expected to be relatively small compared to traffic at the Sacramento Street entrances/exits).

Emissions of pollutants due to project-related vehicle miles traveled (VMT) is shown in Table I below as a percentage of all vehicular emissions within the Local Project Impact Area (LPIA). Computation Sheets, data and procedures contained in the Bay Area Air Pollution Control District (BAAPCD) "Guidelines for Air Quality Impact Analysis of Projects, June, 1975" were used for calculation of this air quality impact.

Table I - Emissions from Project Generated Traffic

Item	CO	HC	NO_X	SO_X	Particulates
	Total Daily Emissions (g/day)				
Project Related Traffic	10788	1599	1289	43.2	104.4
Existing traffic within local Project Impact Area(LPIA)	1,808,700	268,049	215,959	7235	17544
Project Impact (% of existing)	0.596	0.596	0.596	0.596	0.596

From the above impact percentages, it can be seen that the additional vehicular traffic generated by the project will have a very small impact on total vehicular emissions in the vicinity of the site.

Emissions Inside the Parking Garage

The project includes a total of 271 parking spaces. Five-levels of parking are provided in a structure under the plaza area. Two of these five levels are at elevations below Stockton Street. An additional two levels of parking are provided at the base of the Elderly Tower Building together with 7 parking spaces at the base of Building "D".

Fifty-five of the above parking spaces, composed of 48 spaces under the tower building and 7 under Building "D", will be leased to permanent residents of the project (primarily occupants of multi-family housing units). The remaining 216 spaces will be for "pay-as-you-go" customers using the parking for short periods of time during the day or occupants of commercial space.

The rates of emission inside the garage are based on the following assumptions:

- Average travel in the garage: 400 ft. per car.
- Speed in the garage: 5 mile per hour.
- Traffic: High 8 hour average 106 cars/hour
  Afternoon peak 251 cars/hour.
- Normal mix of new and old cars (NOTE: The elderly residents in the tower building will have relatively few cars)
- No natural ventilation.
- Four air changes per hour, in accordance with the Uniform Building Code and City of San Francisco code requirements.
- Relatively clean air is used for ventilation.

Using the above assumptions, rates of emission inside the garage unit will be as shown in Table II below:

Table II - Emissions from Garage Areas

Pollutant	Grams/Hour	
	High 8 hours	Peak hour
Carbon monoxide	376	691
Hydrocarbons	49.1	116
Nitrogen oxides	21.8	51.5
Sulfur oxides	1.5	3.4
Particulates	2.7	6.3

The impact of these emissions on air quality is discussed under "Resulting Pollutant Concentrations."

Project-Related Natural Gas Combustion

The sponsor's architect-engineer has estimated that the single gas-fired hot water boiler serving the project will have a maximum rating of 4,000,000 BTU/Hr. Procedures and data contained in EPA publication AP-42 ("Compilation of Air Pollution Emission Factors, Second Edition") were used to calculate the quantity of emissions of pollutants due to natural gas combustion. If it is assumed that the boiler will be operated "at capacity" (full on), the boiler will produce pollution at the rate of 0.64 lb/hour. Referring to the BAAPCD "Guidelines for Air Quality Impact Analysis of Projects, June, 1975," page A2, it can be seen that "each point source found to be emitting in excess of 10 lb/hour of any pollutant under capacity operating conditions" is considered to be a significant source of pollution. Since the above emissions are 6.4% of this threshold emission rate, the impact of emissions due to natural gas combustion for the project is considered to be insignificant and can be ignored.

Construction Activities

The demolition of buildings on the project site is completed. The impact of construction activity on air quality is not expected to be significant.

Table III - Pollution Concentrations in Garage

Pollutant	Pollutant Concentrations		Standards				% Variance From Standards			
			State		Federal		State		Federal	
	High 8 Hrs	Peak Hr	8-Hr	1-Hr	8-Hr	1-Hr	8-Hr	1-Hr	8-Hr	1-Hr
CO	3.2 mg/m3	5.9 mg/m3	-	-	10 mg/m3	40 mg/m3	-	-	-68	-85
*HC	234 ug/m3	743 ug/m3	-	-	** 160 ug/m3	** 160 ug/m3	-	-	+46	+364
NOX	180 ug/m3	440 ug/m3	-	470 ug/m3	-	-	-	-62	-	-
SOX	16 ug/m3	29 ug/m3	1310 ug/m3	-	-	-	-99	-	-	-
Part.	23 ug/m3	53 ug/m3	-	*** 100 ug/m3	-	*** 260 ug/m3	-	-47	-	-80

* Concentrations adjusted to include only non-methane hydrocarbons.

** Standards shown are for a 3-hour averaging time.

*** Standards shown are for a 24-hour averaging time.

Resulting Pollutant Concentrations

Pollutant Concentrations Inside Garages

Based on the assumptions and emission rates shown above under "Emissions Inside the Parking Garage," and using the BAAPCD guidelines for air pollution calculations, air quality inside the garages will be as shown in Table III (opposite). The negative variances in Table III indicates the percentage that pollutant concentrations are below a particular State or Federal standard and, conversely, positive variances are percentages above a standard. It can be seen from Table III that concentrations of carbon monoxide, nitrogen oxides, sulfur oxides and particulates inside the garage will all be within the standards. Hydrocarbon concentrations inside the garage will have no direct health effects on individuals inside the garage as indicated in the following resume from the Department of Health, Education and Welfare (HEW) publication "Air Quality Criteria for Hydrocarbons":

> "Studies conducted thus far of the effects of ambient air concentrations of gaseous hydrocarbons have not demonstrated direct adverse effects from this class of pollutants on human health. However, it has been demonstrated that ambient levels of photochemical oxidant, which do have adverse effects on health, are a direct function of gaseous hydrocarbon concentrations; and when promulgating air quality standards for hydrocarbons, their contribution to the formation of oxidants should be taken into account."

The effect of hydrocarbon emissions from the garages on oxidant formation in the air basin will be insignificant, and is discussed in the following section of this assessment.

Pollutant Concentrations in Outdoor Areas

The critical outdoor location for pollutant concentrations is at the corner of Stockton and Sacramento Streets. Air quality at this location will be affected by emissions from vehicular traffic along Sacramento and Stockton Streets, by emissions due to project-related natural gas combustion, and by emissions vented from garage spaces. Table IV adds the effects of these three sources of emissions to the existing ambient air quality resulting in a subtotal which excludes the affect of garage emissions and a total which includes garage emissions. Analysis of Table IV indicates the following:

Carbon monoxide concentrations are affected only to a minor extent by emissions due to project-related natural gas combustion and project-generated street traffic. The subtotal in Table IV for these impacts and ambient concentrations (but excluding impact of garage emissions vented to outdoor areas) is 73% of the Federal 8-hour standard for CO centrations. However, the impact of venting garage emissions to either Stockton or Sacramento Streets is significant and results in CO concentrations which are 5.5% above the Federal 8-hour standard.

Table IV - Projected Air Pollution Concentrations at Corner of Sacramento and Stockton Streets Upon Completion of Project

Item	CO (mg/m^3)	HC (ug/m^3)	Oxidant (ug/m^3)	NO$_x$ (ug/m^3)	SO$_x$ (ug/m^3)	Particulate (ug/m^3)
Project Impacts Excluding Garage:						
Natural gas	*	*	#	*	*	*
Vehicular						
1 Hr.	0.82	0.12		0.098	0.003	0.008
8 Hr.	0.11	0.016		0.013	0.0004	0.001
Ambient Air Quality:						
1 Hr.	**12.68	-	203(1)	-	-	-
8 Hr.	** 7.24	-	-	-	-	-
24 Hr.	-	-	-	-	24(1)	129(1)
Annual	-	***1267	-	56	6(2)	-
Subtotal (NG Vehicular and Ambient, but Excluding Garage)						
1 Hr.	13.5		203(1)	56.013+		
3 Hr.		1267+	-			
8 Hr.	7.35		-			
24 Hr.	-		-		24.0004-	129.001+
Annual	-		-			
Garage Impacts (Emissions excluding to Stockton Street)						
1 Hr. (Peak)	5.9	743	#	440	29	53
8 Hr. (Ave)	3.2	234		180	12	23
Total (NG, Vehicular, Garage and Ambient)						
1 Hr.	19.4		203(1)	496		
3 Hr.		1501+	-			
8 Hr.	10.55		-	236		
24 Hr.			-		36-	152-
Annual			-			
Standards						
1 Hr. - State	46	-	200	470	1310	-
Federal	40	-	160	-	-	-
State	-	-	-	-	-	-
3 Hr. Federal		160	-		1300	
State	-	-	-	-	-	-
8 Hr. Federal	10	-	-	-	-	-
24 Hr. State	-	-	-	-	105	100
Federal	-	-	-	-	-	260
State	-	-	-	-	-	-
Annual-Federal	-	-	-	100	-	-

Notes: * Emission of pollutants due to natural gas combustion is at the rate of 0.64 lb /hour maximum. Emission rates of less than 10 lb./hour from point sources are considered by the Bay Area Air Pollution Control District (BAAPCD) to have negligible impact on air quality.

** Calculated values using computation Sheet No. 3 in BAAPCD "Guidelines for Air Quality Impact Analysis of Projects, June, 1975," which considers the total number of "vehicle trip ends per day" within a 1 km x 1 km area centered on the project.

*** Source: BAAPCD, 939 Ellis Street, San Francisco, California

(1) Source: Environmental Protection Agency (EPA). Date represents the second highest concentration of pollutants occurring in San Francisco during 1974

Negligible impact on oxidant concentrations because project-related emissions of hydrocarbons (which are a precursor in the photochemical process which forms oxidant) are only 0.00074% of total hydrocarbon emissions in the Air Basin.

Hydrocarbon concentrations have no direct adverse health effects on individuals, as indicated by the HEW quotation cited above under "Pollutant Concentrations Inside Garages." The emissions of hydrocarbons due to garage exhausts vented to the streets, plus exhausts from project-related traffic on Sacramento and Stockton Streets, will be 0.00074% of total hydrocarbon emissions in the Bay Area Air Basin. Project-related hydrocarbon emissions will, therefore, have an insignificant affect on formation of oxidant in the air basin.

Oxidant concentrations in outdoor areas will exceed the state primary 1-hour standard of 200 mg/m^3 by 1.5% approximately once per year due to ambient air quality. Project emissions of hydrocarbons will have negligible impact on oxidant levels, as stated above.

Nitrogen oxide concentrations at the corner of Stockton and Sacramento Streets are not significantly affected by emissions from project-related natural gas combustion or project-related vehicular traffic on streets. However, garage emissions vented to the streets cause NO_X concentrations to exceed the State 1-hour standard by 5.5%. 8-hour concentrations of 236 ug/m^3 are substantially above the annual federal standard of 100 ug/m^3, again primarily due to garage emissions vented to streets. These concentrations over a prolonged period of time can result in adverse health effects for humans (acute bronchitis) and adverse effects on vegetation (in particular, leaf abscission).

Sulfur oxide concentrations in outdoor areas will be insignificant even after considering the effect of project-related emissions.

Particulate concentrations will exceed the State 24-hour standard by 29% if only emissions from project-related street traffic and project-related natural gas combustion are added to ambient concentrations. Ambient concentrations (without project impacts) account for this excess above the standard. Also, this ambient concentration represents a "worst-case" condition because the second-highest concentration occurring in San Francisco during 1974 was used as the ambient concentration. The impact of garage emissions vented to the streets is significant, raising the total "worst-case" concentrations to 52% above the State 24-hour standard. The high ambient concentrations (without project impact) is considered to be due primarily to windborn dust and is, therefore, intermittent with minimal adverse effects. The contribution of particulate from garage emissions is significant if the exhausts are vented directly to the street with little benefit from mixing and dispersion. Adverse affects on human health, vegetation and materials would only occur if there was prolonged exposure to concentrations in excess of the 24-hour state standard, which is not likely to occur.

Conclusions

1. Air quality inside garages will be generally satisfactory provided since there will be four air changes per hour by means of forced-air-ventilation

2. Air quality in outside areas, in particular along Sacramento and Stockton Streets adjacent to the project, will be significantly affected by exhausts inside the garage spaces if these exhausts are vented directly to Sacramento or Stockton Street. Concentrations of carbon monoxide and nitrogen oxides would exceed air quality standards and, under "worst-case conditions," particulate standards would be exceeded. The affect of other project-related emissions (natural gas combustion, project-related street traffic) on air quality in outside areas is insignificant.

Recommended Mitigation

1. Garage emissions must not be exhausted directly to Sacramento or Stockton Streets. Instead, the exhausts must be exhausted to atmosphere through a stack located on the roof of the highest structure; i.e., the tower, using an adequate forced-air ventilation system. To exhaust garage emissions on any level below this would inevitably impact those residents living above the level of exhaust, and negative health impacts of air pollutants on project residents could result. A design solution to this problem, ensuring that neither pedestrians nor residents will be adversely affected, is a prerequisite for approval of this project.

2. Assignment of preferred parking spaces in the garage as an incentive to commuters is not recommended because use of the parking spaces by commuters is not expected to be significant.

Provided the above mitigation measures are implemented, it is concluded that the project will have no significant adverse impact on air quality in the vicinity of the project.

NOISE

This assessment will examine the existing noise environment in the vicinity of the project and will compare these noise levels against HUD standards for external (outdoor) and interior (indoor) noise exposures as stated in HUD Circular 1390.2, "Noise Abatement and Control."

SOURCES OF NOISE

Vehicular Traffic

The dominant noise source at the site is vehicular traffic along Stockton and Sacramento Streets. This includes a peak hour traffic volume on Stockton Street of approximately 750 vehicles per hour (5% trucks and buses) and 561 vehicles per hour (7% trucks and buses) on Sacramento Street. Normal traffic noises are aggravated by the existence of diesel bus lines adjacent to the site, an 18% gradient on Sacramento Street, stop lights at the corner of Sacramento and Stockton Streets, and three bus stops at the above intersection. In addition, the project is surrounded by 4 to 10 story buildings which tend to reflect, and thus increase, traffic noise.

The greatest single noise source is the #55 Sacramento Street bus which stops at the northeast corner of Stockton and Sacramento Streets, and must then accelerate up the steep Sacramento Street grade toward the west. This bus service operates between 6:30 A.M. and 1:30 A.M. The periods of highest noise level are between 8-9 A.M. and 4-6 P.M., which are the typical peak commuter periods. On Sacramento Street, the evening period is far noisier than the morning period because the street is one-way moving westward from the Central Business District. An additional sharp but brief increase in noise levels occurs about 2:30 A.M. on Sacramento Street as the result of garbage collection activity.

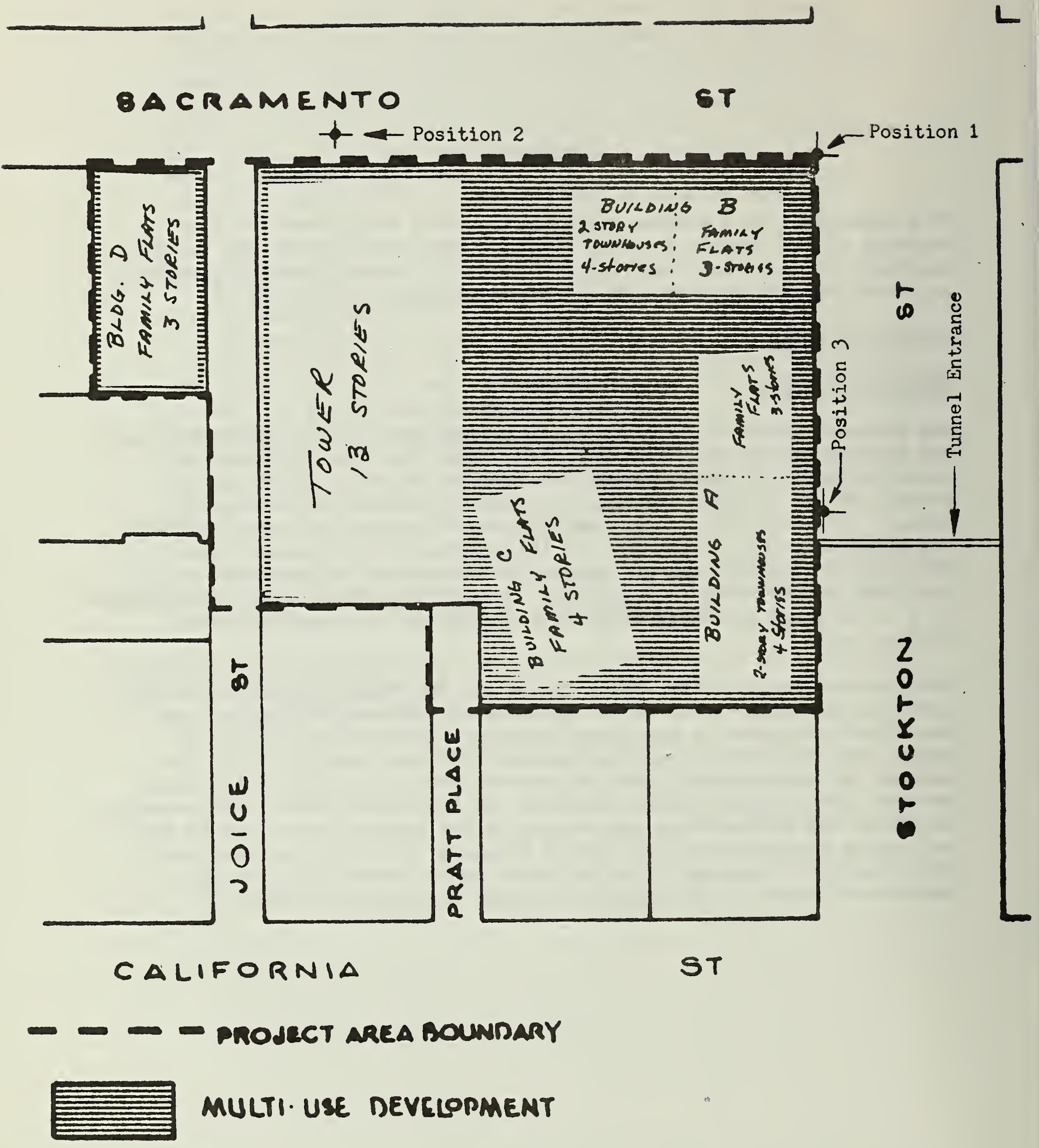

SACRAMENTO ST
Position 2
Position 1
BLDG. D FAMILY FLATS 3 STORIES
TOWER 13 STORIES
BUILDING B
2 STORY TOWNHOUSES 4-stories
FAMILY FLATS 3-STORIES
FAMILY FLATS 3-5 STORIES
Position 3
Tunnel Entrance
BUILDING A
2-STORY TOWNHOUSES 4 STORIES
BUILDING C FAMILY FLATS 4 STORIES
JOICE ST
PRATT PLACE
STOCKTON ST
CALIFORNIA ST
PROJECT AREA BOUNDARY
MULTI-USE DEVELOPMENT
N
0 FEET 50

FIGURE 1. AMBIENT NOISE MEASUREMENT POSITIONS.

Demolition and Construction Noise

Demolition of buildings at the project site is completed. It is expected that construction noise will have a negative short-term impact upon the surrounding area. Excavation and foundation work is expected to be particularly noisy, since the site appears to include a large amount of shallow bedrock.

AMBIENT NOISE MEASUREMENTS

Noise level measurements were taken at three locations as shown in Figure 1. These measurement positions were selected because they bracket the major areas of noise exposure due to vehicular traffic along Sacramento and Stockton Streets and noise exposures between the measurement positions can be obtained by interpolation. The HUD Noise Measurement System (supplied by the National Bureau of Standards, Washington, D. C.) was used for these measurements. Table 1 shows a direct comparison of data printed out by the Noise Measurement System and the HUD General External Exposure Standards for Noise. This comparison results in the following acceptability ratings:

Position No.	HUD Acceptability Rating
1	Normally unacceptable
2	Normally unacceptable
3	Normally unacceptable

The "normally unacceptable" ratings for positions No. 1 and 3 are due to two factors:

a) Noise levels exceeding 65 dB(A) for more than 8 hours per day.

b) Loud repetitive sounds on site (vehicular traffic) during normal sleeping hours (11 P.M. to 6 A.M.).

TABLE 1. COMPARISON OF FIELD NOISE MEASUREMENTS WITH HUD EXTERNAL NOISE EXPOSURE STANDARDS

Standards for General External Exposures Per Circular 1390.2 (Noise Abatement and Control)	Field Noise Measurements			
	Position #1	(1)Position #2	Position #3	Remarks
UNACCEPTABLE (Exceptions are strongly discouraged and requires a 102(2)c environmental statement and the Secretary's approval): Exceeds 80 dB(A) 60 minutes per 24 hours	Exceeded 80 dB(A) 43 min. per 24 hrs.	(1)Exceeded 80 dB(A) 14 min. per 24 hrs.	Exceeded 80 dB(A) 28 min. per 24 hours	Positions #1, #2 and #3 not "unacceptable" at the 80 dB(A) threshold
Exceeds 75 dB(A) 8 hours per 24 hrs.	Exceeded 75 dB(A) 2.49 hrs per 24 hours	Exceeded 75 dB(A) 0.88 hrs per 24 hours	Exceeded 75 dB(A) 2.35 hrs per 24 hours	Positions #1, #2 and #3 not "unacceptable" at the 75 dB(A) threshol
DISCRETIONARY - NORMALLY UNACCEPTABLE (Approvals require noise attenuation measures, the Regional Administrator's concurrence and a 102(2)c environmental statement) Exceeds 65 dB(A) 8 hours per 24 hours	Exceeded 65 dB(A) 14.64 hrs per 24 hours	(1)Exceeded 65 dB(A) 6.72 hrs per 24 hours	Exceeded 65 dB(A) 15.51 hrs per 24 hours	Positions #1 and #3 are "normally unacceptable".
Land repetitive sounds on site	922 events over 80 dB(A) per 24 hours	427 events over 80 dB(A) per 24 hours	606 events over 80 dB(A) per 24 hours	Loud repetitive sounds due to diesel-driven buses and trucks along Sacramento and Stockton Streets
DISCRETIONARY - NORMALLY ACCEPTABLE. Does not exceed 65 dB(A) more than 8 hours per 24 hours	Exceeded 65 dB(A) 14.64 hrs per 24 hours	(1)Exceeded 65 dB(A) 6.72 hrs per 24 hours	Exceeded 65 dB(A) 15.51 hrs per 24 hours	Position #2 is "normally acceptable" by this criteria but "normally unacceptable" due to loud repetitive sounds on site (see above)
ACCEPTABLE Does not exceed 45 dB(A) more than 30 minutes per 24 hours	Exceeded 45 dB(A) 23.95 hrs per 24 hours	Exceeded 45 dB(A) 23.92 hrs per 24 hours	Exceeded 45 dB(A) 23.27 hrs per 24 hours	

NOTES: (1) Measurements for Position #2 were taken 8 ft. outside the property line on a street light pole and 16 ft. from uphill vehicular traffic. Data shown has been adjusted to the desired location at the property line using procedures prescribed by the National Bureau of Standards (NBS).

The "normally unacceptable" rating for position No. 2 is due to loud repetitive sounds on site (vehicular traffic) during normal sleeping hours.

A definition of "normally unacceptable" is given in the HUD "Noise Assessment Guidelines," page 1, as follows:

> "The noise exposure is significantly more severe so that unusual and costly building constructions are necessary to assure some tranquility indoors, and barriers must be erected between the site and prominent noise sources to make the outdoor environment tolerable."

NOISE EXPOSURE STANDARDS

Noise mitigation is required to convert the "normally unacceptable" environment to an "acceptable" level for both exterior and interior noise exposures. Acceptable levels of noise exposure are defined in HUD Circular 1390.2 as follows:

> For exterior exposures:
>
> > "Does not exceed 45 dB(A) more than 30 minutes per 24 hours."
>
> For interior exposures:
>
> > "Does not exceed 55 dB(A) for more than an accumulation of 60 minutes in a 24-hour period, and
> >
> > Does not exceed 45 dB(A) for more than 30 minutes during night time sleeping hours from 11 p.m. to 7 a.m., and
> >
> > Does not exceed 45 dB(A) for more than an accumulation of eight hours in any 24-hour day."

IMPACT OF PROJECT DESIGN

Some mitigation of exterior exposures to noise is inherent in the project design by virtue of the following design features:

1) The housing development will be elevated above Stockton Street at measurement positions No. 1 and 3, which are the worst noise exposure locations. This will eliminate much of the line-of-sight noise transmission from noise sources along Stockton Street (and much of Sacramento Street) to noise receptors located in the plaza area of the housing development.

2) The buildings are positioned on the project site so as to shield much of the plaza area from sound emanating from Stockton and Sacramento Streets.

The above notwithstanding, the project design includes other features which make it difficult or impossible to meet the HUD noise exposure standards in the existing noise environment. These negative features include:

1) No mechanical ventilation for living units; therefore, windows must be opened to obtain fresh air, thereby reducing noise attenuation through wall assemblies. In some cases, HUD interior noise exposure standards will be exceeded.

2) The barrier wall located between the Elderly Tower Building and Building "B" has large openings and, therefore, will not provide effective shielding of the plaza area from noise emanating from traffic on Sacramento Street.

3) Balconies facing the plaza area between the Elderly Tower Building and Buildings A, B, and C will tend to reflect street noise into the plaza area, thereby increasing the traffic noise level for exterior exposures.

NOISE SOURCE ATTENUATION

Some progress has been made in development of quieter buses which has reduced noise levels at the project site. Officials of the San Francisco Municipal Railway (MUNI) and the City of San Francisco Planning Department have indicated that 200 of 400 diesel-driven buses have been retrofitted thus far to reduce noise levels. Changes being implemented include:

(1) Reduction of maximum engine speeds by approximately 200 RPM,

(2) Installation of new variable-speed fan assemblies,

(3) Installation of new muffler assemblies,

(4) Use of smaller fuel injectors which reduce exhaust noise.

Prior to the above modifications, the noise level from MUNI buses was a maximum of 92 dB(A) at 50 feet and normally ranged between 82 and 86 dB(A). Tests performed by the City of San Francisco and the California Department of Transportation (CALTRANS) indicate that the above retrofit of buses will reduce noise levels by 6 to 10 dB(A) at 50 feet. Reduced noise levels (after retrofit) will, therefore, be a maximum of from 82 to 86 dB(A) at 50 feet. This is a significant reduction inasmuch as 82 dB(A) is half as loud as 92 dB(A); however, it is doubtful that retrofit of the buses by itself will make the noise exposure at the project site acceptable because the 65 dB(A) threshold will still be exceeded at the property line for more than 8 hours per day.

Buses are assigned to the #30, #30 express, and #55 routes, which pass by the project site, on a random basis and are changed daily. Therefore, it is not possible to determine the extent that the noise data in Table I reflects the quieter, retrofitted buses. However, for the purpose of this assessment, it is assumed that the same ratio of retrofitted and nonretrofitted buses which exists in the city as a whole is reflected in the data of Table I; i.e., 50% retrofitted buses and 50% nonretrofitted buses. MUNI officials have indicated that it was planned to accomplish the retrofitting of buses concurrently with engine overhauls; however, lack of mechanics has made it difficult to accomplish even routine maintenance of buses and no retrofitting is being accomplished at this time. Because completion of the retrofit program is contingent upon availability of mechanics, which cannot be adequately predicted, it is assumed that the noise environment due to bus traffic at the time of completion of the project will be essentially the same as that shown in Table I. It is not considered practical to schedule only the quieter, retrofitted buses for the routes adjacent to the project site.

MITIGATION

The project design must be modified to include mitigating measures to assure that interior and exterior noise exposures will be "acceptable" as defined in HUD Circular 1390.2. These mitigating measures shall include, but not necessarily be limited to, the following:

For interior exposures;

1. Provide mechanical ventilation of interior living spaces as necessary, to preclude having to open windows for ventilation at times when maximum noise attenuation is required.

2. Provide adequate sound-isolating wall assemblies (windows, walls, ventilation openings, etc.) to attenuate traffic noise.

Prior to the above modifications, the noise level from MUNI buses was a maximum of 92 dB(A) at 50 feet and normally ranged between 82 and 86 dB(A). Tests performed by the City of San Francisco and the California Department of Transportation (CALTRANS) indicate that the above retrofit of buses will reduce noise levels by 6 to 10 dB(A) at 50 feet. Reduced noise levels (after retrofit) will, therefore, be a maximum of from 82 to 86 dB(A) at 50 feet. This is a significant reduction inasmuch as 82 dB(A) is one-tenth as loud as 92 dB(A); however, it is doubtful that retrofit of the buses by itself will make the noise exposure at the project site acceptable because the 65 dB(A) threshold will still be exceeded at the property line for more than 8 hours per day.

MUNI officials advise that the retrofit program is being scheduled concurrently with engine overhauls and that it will be several years before retrofit is completed. In the meantime, it is not considered practical to schedule only the quieter, retrofitted buses for the routes adjacent to the project site.

MITIGATION

The project design must be modified to include mitigating measures to assure that interior and exterior noise exposures will be "acceptable" as defined in HUD Circular 1390.2. These mitigating measures shall include, but not necessarily be limited to, the following:

For interior exposures;

1. Provide mechanical ventilation of interior living spaces as necessary, to preclude having to open windows for ventilation at times when maximum noise attenuation is required.

2. Provide adequate sound-isolating wall assemblies (windows, walls, ventilation openings, etc.) to attenuate traffic noise.

For exterior exposures;

1. All balconies which will reflect traffic noise into the outdoor living areas of the project to such an extent as to cause HUD exterior noise exposure standards to be exceeded shall have sound-absorbing material or sound-reflecting surfaces (or other design features) which will mitigate this problem, or these balconies to be eliminated.

2. Provide an adequate acoustical barrier along the perimeter of the project between the Elderly Tower Building and Building "B."

Additional Requirement

All noise mitigation measures for the project must be designed by an experienced acoustical engineer licensed in the State of California, or an experienced acoustical engineer who is a member of the Institute of Noise Control Engineering (INCE). The above shall be indicated by the acoustical engineer's signature and stamp.

The above mitigation measures must be viewed as minimum requirements. Also, specific design details for mechanical ventilation systems, sound-isolating wall assemblies, modifications or deletion of balconies, and acoustical barriers have purposely been omitted to allow the Sponsor maximum latitude in design of the project. It is incumbent upon the Sponsor, through the acoustical consultant, to demonstrate how the above minimum mitigation measures are to be implemented, and to provide such other mitigation as may be required to meet the noise standards in HUD Circular 1390.2.

HOUSING NEED

Need Statement

For a long time, it has been known that there existed a need for low and moderate income housing in Chinatown and especially for the elderly. In 1970, the City with a HUD 701 Planning Grant undertook a study to determine the housing needs of the Chinatown area and to develop a strategy for meeting the identified need. For the purpose of the study, the Chinatown area encompassed the area bounded by Van Ness, Bay, Sansome, and Bush Streets. This study which was entitled San Francisco Chinatown Housing and Recreation Program substantiated the long-known fact that persons in the Chinatown area were living in substandard and overcrowded condition and that newly constructed housing as well as a substantial amount of the existing housing was renting in excess of the rent-paying ability of many of those most in need of standard housing.

The study indicated that over 10,000 elderly persons resided in the Chinatown area. The study also indicated that over 26% of the population lived in overcrowded conditions. In 3,700 housing units, over 17,000 persons were found to be living. Substandard housing conditions were found to be widespread with over 60% of the housing stock (over 20,000 units) exhibiting some form of code violation. A 1974 study undertaken by the Bureau of Building Inspection revealed that 42% of the housing stock exhibited some form of code violation.

Over the past 15 years, the population of the area has continued to grow while the overall housing supply has declined slightly. According to the study, over 2,300 housing units concentrated in the core area of the larger Chinatown area were lost. The substantial majority of housing constructed in this area since the early 1960's has been for middle and upper income persons. No new subsidized housing for the elderly has been constructed in the Chinatown core area which continues to evidence a need for low and moderate income housing for the elderly.

Recent figures provided by the San Francisco Department of City Planning support the fact that there is a need to provide low income housing in Chinatown for the elderly. Over 35% (2250 households) of the households in the Chinatown core area (This area represents only a portion of the area covered in the 1970 study referred to above and includes Census Tracts 107, 113, 114 and 118) are elderly. Of the elderly households in the core area of Chinatown, 67% (1510 households) are very low income (have incomes of less than 50% of the City's median income as compared to the city wide average of 20%. 50% (1441 persons) of the elderly people in Chinatown live in housing which lacks adequate plumbing facilities. Hotel or guest rooms which lack kitchen and generally exclude plumbing comprise 50% of all the housing in Chinatown. The majority of this type of housing is occupied by elderly persons. The study undertakes in 1974 by the Bureau of Building Inspection indicated that 48% of the housing in the Chinatown core area had some form of code violation. 50% of the elderly households in Chinatown pay more than 25% of their income for rent. City wide 19% of those over 65 years of age have incomes below the poverty level. In Chinatown, 32% of the elderly (1200 persons) have incomes below the poverty level.

While the proposed housing project will be located in Chinatown for the purpose of addressing the needs of the immediate area, occupancy will not be restricted to only residents of Chinatown. City wide, according to the City's 1976 Housing Assistance Plan, over 28,000 elderly households throughout the city are in need of housing assistance. Of this number, approximately 150 elderly persons will require housing assistance in the immediate future due to being displaced by public action. The San Francisco Housing Authority has over 4,000 elderly households on the waiting list for zero or one bedroom units.

The need for low income elderly housing in San Francisco exists what does not exists is an adequate supply of low income housing especially in the Chinatown core area. The proposed 180 unit housing project to be located at Sacramento and Stockton Streets, which was identified in the 1970 San Francisco Chinatown Housing Study as one of the sites on which housing should be developed, is being constructed to address a portion of this long recognized housing need.

CULTURAL RESOURCES

1. Historical Considerations

On the site there are no known historic, archeological or architectural features, since the site is essentially raw land, having been cleared of the housing which formerly occupied it.

Directly across from the Project on Sacramento Street on the corner of Joice is the Donaldina Cameron House, which has been designated by the Board of Supervisors as a San Francisco Landmark. This is administered by the Occidental Board Home, the mission of the Presbyterian Church to the Chinese in San Francisco and the only "foreign mission" enterprise ever carried on in the United States. It was founded in 1873, and it moved to its present location in 1881. After the fire of 1906, the building was rebuilt of clinker brick on a substructure of concrete and rubble. The effect of the Landmark designation is to prevent any exterior alterations to the structure without specific City approval. Cameron House is now a very active community center, serving mainly the youth of Chinatown.

The State Historical Board has been consulted regarding the Donaldina Cameron House. It is the opinion of the State Historical Board that the structure is potentially eligible for inclusion in the National Register of Historic Places; it has been identified in three separate surveys but has not been nominated.

Applying the definition of "Criteria of Effect" to this project, it is the opinion of HUD that the Stockton-Sacramento project will cause no change "beneficial or adverse, in the quality of the historical, architectural, archeological or cultural character that qualifies the property" (Cameron House) "under the National Register Criteria." In accordance with Section 106 of the National Historic Preservation Act of 1966, concurrence with HUD's funding of "no effect" has been requested from the State Historic Preservation Officer. (See Appendix D)

It is expected that the presence of Cameron House across the street from the Project may be of positive value to some project residents who may participate in some of the activities there.

2. Cultural Assets

Residents of the Project, which is near the core of Chinatown, will have a wide range of cultural and recreational facilities available to them within a few blocks.

The Chinatown Branch of the San Francisco Public Library is located at 1135 Powell Street.

The following centers offer group work programs, recreation and craft services, adult study and service groups and social casework services:

Donldina Cameron House Community Center, 920 Sacramento Street (discussed above)
YWCA - Clay Street Center, 965 Clay Street
YMCA - Chinese Branch, 855 Sacramento Street
Salvation Army - Chinatown Corps, 2 Waverly Place

SOLID WASTE

For the purpose of defining the distinctions between different kinds of wastes, the State Water Resources Control Board has adopted a statewide grouping system. All waste materials are in either Groups 1, 2 or 3 in this system, and each group has its own particular storage, handling, collection and disposal requirements. A summary of the groups is presented in Appendix I. In general, toxic and hazardous wastes are in Group I; Group 3 wastes are inert solids, such as construction and demolition wastes; and all other wastes, including most residential and commercial refuse, are in Group 2.

This assessment deals primarily with Group 2 materials which will be generated by the future residents of the Mei Lun Yuen development in Chinatown.

No Group I hazardous materials are anticipated as a result of this development; thus the collection and disposal of these materials is not covered in this assessment.

Current Storage* and Collection Procedures

Household waste consisting of waste or discarded food, animal and vegetable matter, discarded containers of food, animal and vegetable matter and ashes shall be placed in suitable metal cans with tight fitting metal lids. Waste paper and boxes and other refuse materials not subject to putrefaction or decay, and cuttings from trees, lawns and gardens may be placed in any suitable container. The Director of Public Works has established the maximum size container for residences and flats as 32 gallons; however, at the discretion of the refuse collector, an oversize container up to a maximum of 64 gallons may be used. Containers for apartment houses up to 600 rooms shall be of types and sizes, each not exceeding 80 gallons in capacity, suitable for emptying the contents thereof into the collector's container. Containers for apartments over 600 rooms shall be sized as required of the refuse collector.

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*All solid waste must be stored in conformance with requirements of the San Francisco Fire Code.

Construction and demolition waste shall be removed from the site within a reasonable time established by the permit issued by the Building Inspector of the Department of Public Works, for each construction and/or demolition job.

Street sweepings shall be stored in unobtrusive areas with complete respect to the wishes of the area residents and picked up daily by City forces.

Recreational wastes shall be stored in cans or removed to the transfer station by the scavenger and City forces.

Abandoned, wrecked, dismantled or inoperative vehicles or parts thereof create an unattractive nuisance and shall be abated in accordance with Ordinance No. 249-74 dated May 20, 1974.

The collection of household, commercial and industrial, and institutional waste is accomplished by two refuse collection companies licensed by the Director of Public Health. The Golden Gate Sisposal Company serves the Chinatown Area. Collection of the waste shall be at least once a week from all dwellings and commercial and industrial facilities. Owners of all dwellings are now required to subscribe to and pay for refuse collection service to that dwelling in accordance with Ordinance No. 20-72 which became operative on and after July 1, 1972.

To arrange for refuse collection, the potential customer telephones the company servicing the area and requests service. Refuse collection and disposition charges and fees for residences, flats and apartment houses of not more than 600 rooms are set by a Refuse Collection and Disposal Rate Board established by the City Charter; charges and fees for other facilities are subject to contract between the waste producer and the refuse collection company servicing the area.

Leaves, tree cuttings and litter are collected and hauled to the Transfer Station by City forces and equipment five days a week. Street sweepings are collected and hauled to the Transfer Station by City forces and equipment. The street sweepings are dumped at the Transfer Station five days a week, Monday through Friday.

Debris boxes may be utilized for the loading and transporting of excavated and waste materials derived from the construction, reconstruction, alteration, or demolition of real property structures; or the removal of debris and waste materials not required by law to be otherwise disposed of by owners, lesses or occupants of real property in accordance with Section 725.2, Chapter X, San Francisco Public Works Code. Six debris box owners are registered for operation with the Department of Public Works. The potential debris box customer selects a debris box operator and negotiates a contract for the use of the box including the disposition of the waste in a dump. The boxes can be placed on the sidewalks or in the roadway as directed by the Department of Public Works. All contents of debris boxes shall be completely covered at all times while being transported through the City streets.

Receptacles used for the collection of household, commercial and industrial, institutional, and domestic animal wastes may be placed upon the sidewalk in front of the producer's premises only on the day the wastes are to be collected by the refuse collectors or after 6:00 P.M. of the day prior to the day of collection. The producer must remove the receptacles from the sidewalk immediately upon opening the premises for business on the day of collection in accordance with Ordinance No. 155-73.

The refuse collected by the refuse collectors must be disposed of at the Transfer Station as designated by the Board of Supervisors in accordance with the Refuse Collection and Disposal Ordinance.

Transfer Station

A large truck transfer station serving San Francisco is situated at the foot of Tunnel Avenue and Beaty Road in the southeast corner of the City adjacent to the County line. This facility is operated seven days a week by the Solid Waste Engineering and Transfer System to handle the mixed municipal, commercial and industrial waste from San Francisco. Nearly an acre of floor space in the transfer building is capable of accommodating 110 route trucks an hour and up to 5,000 tons of refuse daily. As incoming collection trucks unload into a large pit two Caterpillar D-8 tractors run over the waste, breaking and smashing large bulky items such as lumber, refrigerators and sofas. The "Cats" then push the waste to the tunnel area where approximately half of the waste, unrecoverable materials which are collected from commercial accounts, is loaded directly into transfer trucks and trailers.

The household waste, approximately one-half of the total, is conveyed to a 300-horsepower horizontal hammermill which breaks open bags and exposes tin cans. A conveyor carries the shredded waste to the counter-rotating magnetic drums which pull out the cans which are then loaded into large open top vans and shipped to Sacramento for further processing. The remainder of the waste is loaded into transfer trucks and trailers. The recovery system is privately financed and operated by Los Angeles By-Products Company.

The San Francisco Transfer Station was used as a model for the development of the guidelines contained in the State minimum standards for Solid Waste Handling and Disposal (California Administrative Code, Title 14, Div. 7, Chap. 3). As of October 1975, the transfer station was operated over and above the preceding State minimums which become applicable on July 1, 1976.

Completely enclosed transfer trucks and trailers haul the waste from the Transfer Station to the Mountain View Disposal Site upon the terms and conditions included in the Waste Disposal Agreement signed in November 1975. The waste dumped at the Transfer Station is transported to the Mountain View disposal site the same day, although there is capacity in the pit for about two days' storage.

Disposal Facilities

On March 2, 1972, the California State Water Resources Control Board issued the Classification of Solid Waste Disposal Sites shown in Appendix II. The previously discussed waste class groupings were established at the same time.

The regional water quality control boards were instructed to determine the potential threat posed by each disposal site to the State's waters. Then, discharge specifications were issued to each site and the site operator was required to file for a discharge permit. In so doing, he was required to indicate how site modifications and methods of operation could meet the specifications before a permit was issued. Periodic inspections are made by the regional board staff to note compliance - or lack of same - with the permit. In extreme cases, the regional boards can issue cease and desist orders or revoke permits.

In essence, the categorization of a site into either Class I, Class II, or Class III reflects the degree of probability that the wastes in the site may come in contact with water and/or pollutants could be conveyed from the site boundaries to state waters. For example, a Class I site has an extremely low probability; a Class III designation implies certainty of contact and/or conveyance. Class I sites may accept Group 1, 2 or 3 wastes; Class II sites may accept Group 2 and 3 wastes; and Class III sites may accept only Group 3 wastes.

No disposal facilities are available within San Francisco. The solid waste from the transfer station and some construction and demolition waste are disposed of in Mountain View, Santa Clara County. The remainder of the construction and demolition waste is disposed of in the privately owned dump sites in Colma, San Mateo County. Any hazardous and extremely hazardous wastes and other Group I wastes are disposed of in Class I dumps in Contra Costa County.

The site in Mountain View covers 655 acres of low land at the northern end of Stierlin Road which is being developed into Shoreline Regional Park. It is a typical example of a local sanitary fill in which the solid wastes are hauled from the transfer station to the landfill site by covered truck and trailer. The park which is being developed with San Francisco refuse forms a wide defense perimeter with open green spaces and fresh air and adds a recreational resource to the region which will be complete with a small zoo, amphitheater, equestrian center, golf course, lakes, tennis courts, swimming pools, picnic areas, hiking and walking trails, boating and rifle-pistol and archery ranges. In addition, four wells have been drilled and methane gas generated from the refuse is being pumped on an experimental basis.

A new contract was signed in November 1975 which will allow San Francisco to continue to dispose of Group 2 and 3 waste in the Mountain View landfill for the next eight years. Wast discharge requirements from the Regional Water Quality Control Board are outlined in that Agency's resolution No. 70-67 dated August 27, 1970. The agencies responsible for inspection of the site include the Regional Water Quality Control Board, the Bay Area Pollution Control District, the City of Mountain View, and the Army Corps of Engineers.

The City and County of San Francisco is currently preparing its medium- and long-range solid waste management plan as required by the State Solid Waste Management and Resource Recovery Act of 1972. The short-term portion of the study has been completed. Transportation of San Francisco solid wastes by rail-haul to a remote desert region in Lassen County could convert barren and unusable lands into possible grazing land. This site could accept all Bay Area solid refuse for several hundred years. The rail-haul to Lassen County was evaluated by the San Francisco Department of Public Works, but it was not implemented as the Mountain View solution was more economical.

Numerous recovery systems will be studied by the City in cooperation with private industry during 1976 and 1977 to determine the best system for disposing of San Francisco's solid waste. Among those studied will be the Bay Delta Resource Recovery Demonstration, Phase 2, at the Transfer Station, and various pyrolysis, incineration and fuel recovery systems. The Department of Public Works will review development in the "state of the art" of solid waste management, particularly systems most applicable to San Francisco. In 1978, the best disposal method and resource recovery system for San Francisco will be selected and financing obtained. Design of the system will be accomplished in 1979 and 1980 and the system constructed in 1980 and 1981.

Expected Impacts

It is estimated that the annual quantity of solid waste generated in San Francisco in 1975 was 1,281,000 tons of which an estimated 1,209,000 tons was disposed of out of the County. The annual quantity of solid waste produced in San Francisco is estimated to increase to 1,409,000 tons in 1990 and then decrease to an annual rate of 1,259,000 tons in 2000. Seven volunteer recycling centers are operating in San Francisco and they, along with the scavenger companies, are estimated to recycle approximately 37,000 tons of materials in 1975. All of these estimates include the solid wastes generated by residents of Chinatown. At full development it is anticipated the residents of the Mei Lun Yuen development will generate less than 500 tons per year which is less than 0.01% of the total generated by the City in 1975. Thus the impact upon the Mountain View or any future disposal site is expected to be negligible.

In addition, it is estimated that well over half of the future residents of Mei Lun Yuen are probably already living in San Francisco and their expected production of solid waste is already included in the City's calculations.

When the contract is let for construction, the contractor will include the disposal of the construction-generated solid waste as part of the package. Some of this may go to the Mountain View site. The Colma Hillside rubbish site which handles much of the construction waste from San Francisco as well as the general public in the area is located along Hillside Road at the base of San Bruno Mountain and is operated by the Colma Dump Company. Waste received is compacted and spread with a loader and crawler tractor. The site is handling 250 tons per day during a five day week and should remain operational until 1984 at the present rate of filling. The site is inspected by the San Mateo County Health Department, the Regional Water Quality Contract Board and the State Department of Public Health. They are the likely recipients of the construction waste from this project and in response to a telephone call noted that these wastes would probably not shorten the life of the dump by more than a day. There will be a very minor impact resulting from the disposition of dust on city streets during construction and hauling to disposal sites. Significant quantities of dust or debris spillage will not be encountered due to a city ordinance requiring contractors to water spray during construction and to clean spillage along the land route. The Solid Wastes Section of the California Department of Public Health concurs with this.

APPENDIX I
Waste Grouping System
(State Water Resources Control Board)

GROUP I WASTES

Group I wastes consist of or contain toxic substances and substances which could significantly impair the quality of usable waters. Examples include but are not limited to the following:

Municipal Origin

- Saline fluids from water or waste treatment processes
- Community incinerator ashes
- Toxic chemical toilet waste

Industrial Origin

- Brines from food processing, oil well production, water treatment, industrial processes, and geothermal plants
- Toxic and hazardous fluids such as cleaning fluids, petroleum fractions, acids, alkalies, phenols, and spent washing fluids
- Substances from which toxic materials can leach such as ashes, chemical mixtures, and mine tailings
- Rotary drilling mud containing toxic materials

Agricultural Origin

- Pesticides or chemical fertilizers
- Discarded chemical containers

Other toxic waste such as compounds of arsenic, mercury, or chemical warfare agents.

GROUP 2 WASTES

Group 2 wastes consist of or contain chemically or biologically decomposable material which does not include toxic substances nor those capable of significantly impairing the quality of usable waters. Examples include but are not limited to the following:

Municipal Origin

- Garbage from handling, preparation, processing, or serving of food or food products
- Rubbish such as paper, cardboard, tin cans, cloth, glass, etc.
- Street refuse such as sweepings, dirt, leaves, catchbasin cleanings, litter, yard clippings, glass, paper, wood, and metals.
- Dead animals and portions thereof
- Abandoned vehicles
- Sewage treatment residue such as solids from screens and grit chambers, dewatered sludge, and septic tank pumpings.
- Water treatment residue such as solid organic matter collected on screens and in settling tanks
- Ashes from household burning
- Tires and rubber scrap

Industrial Origin

- Garbage from handling, preparation, or processing of food or food products
- Construction and demolition materials such as paper, cardboard, wood, metal, glass, rubber products, roofing paper, and wallpaper
- Infectious materials and hospital or laboratory wastes authorized for disposal to land by official agencies, charged with control of plant, animal, or human disease.
- Highly flammable or pyrophoric materials

Agricultural Origin

- Plant residue from the production of crops including but not limited to stalks, vines, green drops, culls, stubble, hulls, lint, seed, roots, stumps, prunings, and trimmings.
- Manures
- Dead animals or portions thereof
- Adequately cleaned pesticide containers

GROUP 3 WASTES

Group 3 wastes consist entirely of nonwater soluble nondecomposable inert solids. Examples include but are not limited to the following:

- Construction and demolition wastes such as earth, rock, concrete, asphalt paving fragments, inert plastics, plasterboard, and demolition material containing minor amounts of wood and metals
- Industrial wastes such as clay products, glass, inert slags, asbestos, inert tailings, and inert plastics.

APPENDIX II

Classification of Waste Disposal Sites

(State Water Resources Control Board)

CLASS I DISPOSAL SITES

Those sites at which complete protection for the quality of ground and surface waters and public health and wildlife resources is provided for all time from waste deposited therein. These sites are designated as capable of accepting for disposal Groups 1, 2, and 3 wastes. The following criteria must be met for qualification as Class I.

- Geological conditions are naturally capable of preventing vertical hydraulic continuity between liquids and gases emanating from the waste in the site and usable ground or surface waters.
- Geological conditions are naturally capable of preventing lateral hydraulic continuity between liquids and gases emanating from wastes in the site and usable ground or surface waters, or the disposal area has been modified to achieve such capability.
- Underlying geological formations which contain rock fractures or fissures of questionable permeability must be permanently sealed to provide a competent barrier to the movement of liquids or gases from the disposal site.
- Inundation of disposal areas shall not occur until the site is closed in accordance with requirements of the regional board.
- Disposal areas shall not be subject to washout.
- Leachate and subsurface flow into the disposal area shall be contained within the site unless other disposition is made in accordance with requirements of the regional board.
- Sites shall not be located over zones of active faulting or where other forms of geological change would impair the competence of natural features or artificial barriers which prevent continuity with usable waters.
- Sites made suitable for use by man-made physical barriers shall not be located where improper operation or maintenance of such structures could permit the waste, leachate, or gases to contact usable ground or surface waters.
- Sites which comply with the aforementioned items but would be subject to inundation by a tide or a flood of greater than 100-year frequency may be considered by the regional board as a limited Class I disposal site.

CLASS II DISPOSAL SITES

Those sites at which protection to ground and surface waters and public health and wildlife resources is provided from Groups 2 and 3 wastes.

Class II-1 sites are those overlying usable groundwater, and natural geologic conditions are capable of preventing hydraulic continuity between liquids or gases and usable water, or the disposal site has been modified to achieve such capability.

Class II-2 sites are those having hydraulic continuity with usable groundwater but geologic and hydraulic features assure protection of water quality. Such features might include soil type, artificial barriers, or sufficient depth of groundwater.

The following criteria must be met for qualification as Class II:

- Disposal areas shall be protected by natural or artificial features so as to assure protection from any washout and from inundation which could occur as a result of tides or floods having a predicted frequency of once in 100 years.
- Surface drainage from tributary areas shall not contact Group wastes in the site during disposal operations and for the active life of the site.

- Gases and leachate emanating from waste in the site shall not unreasonably affect groundwater during the active life of the site.
- Subsurface flow into the site and the depth at which water soluble materials are placed shall be controlled during the construction and operation of the site to minimize leachate production and assure that the Group 2 waste materials will be above the highest anticipated elevation of the capillary fringe of the groundwater. Discharge from the site shall be subject to waste discharge requirements.

CLASS III DISPOSAL SITES

Those sites at which protection to water quality is provided from Group 3 wastes by location, construction, and operation which prevent erosion of deposited material.

LIQUID WASTES (SEWERS)

Description

The Mei Lun Yuen Project will be provided sewer service by the City of San Francisco which has a combined sanitary and storm sewer collection system.

The existing City sewer on Sacramento Street which will serve the Project is a 21-inch vitrified clay pipe (VCP) which has a capacity of 64 cubic feet per second (cfs) or 41.4 million gallons per day (MGD). This 21-inch sewer was completed in 1970 to Stockton Street where it discharges to a 3 x5 feet brick sewer to Sansome Street. There it connects into the 8.5 feet diameter North Point Main flowing to the North Point Sewage Treatment Plant (NPSTP).

The City sewer system from the Project to the Plant has adequate capacity as indicated by the City to accommodate the estimated 0.05 mgd average daily sewage flow from the Project. It was designed to handle combined storm and sanitary sewage flows (wet weather) for five-year storms.

Capacity for storm water on the City sewer system is discussed elsewhere in this Environmental Impact Statement under Hydrology and Flood Drainage.

Proposed Sewage Collection System

Sanitary sewage from the residents in the Project is estimated to average 0.05 mgd based on a total of 175 dwelling units with a total population estimated at 384 persons generating 125 gpd per person (gpcd).

The sanitary sewage will be collected in the combined sewer system and discharged with the storm water through two sewer laterals one from Building D and one from the lower structure into the 21-inch city sewer on Sacramento Street. Final design plans of building sewers are not yet completed. These will be reviewed for acceptability when detailed construction plans are submitted to HUD for approval.

Two sewer laterals are proposed to serve the Project connecting into the 21-inch city sewer on Sacramento Street. The Building D sewer should be a minimum of 6-inch diameter rather than the 4-inch proposed. The Tower sewer should be a minimum 8-inch diameter.

The 41.4 mgd capacity of the 21-inch City sewer on Sacramento Street is adequate for the sanitary sewage from the Project as are the 3 x 5 feet sewer on Sacramento Street from Stockton to Sansome Streets and the 8.5 feet diameter North Point Trunk Main on Sansome to the NPST Plant.

Summary of San Francisco Sewage Treatment Facilities

The City and County of San Francisco has formulated a program to correct deficiencies in its sewage collection and treatment system. These deficiencies, which result in contamination of the City's beaches and pollution of receiving water near the system's many points of discharge, have received the attention of the Regional California Water Control Board; and as a result, several orders to Cease and Desist these polluting activities have been issued.

In response to these orders, the City has prepared the San Francisco Wastewater Management Master Plan (SFWWMMP). The Master Plan includes a series of timed construction projects which will incrementally provide improved treatment and expanded capacity for the City's waste water flows.

An updated schedule for improvements is given below. A summary of the schedule for Stage I improvements is as follows:

Element	Cost ($ mil)	Estimated Completion Date
Southeast Plant Solids Handling	10.0	6/80
Richmond-Sunset Plant Interim Improvements	0.2	7/78
Southeast & North Point Interim Improvements	1.4	6/80
Pilot Plant & Toxicity Studies	1.7	6/74
Transport System-North Point-east	23.5	6/78
Southeast Primary Plant Expansion	24.7	6/80
Secondary Facilities for Southeast Flow	28.0	6/80
Secondary Facilities for North Point Flow	36.0	6/80
Lake Merced 2-Mile Outfall	30.0	4/81
Westside Transport System	140.0	1/80
North Shore Wet Weather Transport (Transport to North Point & Southeast)	120.0	1/80
Total	$415.5	

General Description of City Sewage System

Improvements have been made to the City's sewerage system by the construction of three sewage treatment plants and a collection system consisting of interceptor sewers and pumping stations to intercept the dry weather flows which were discharging to the Bay and Ocean through shoreline outfalls. Because of cost considerations, the treatment plants and intercepting systems were originally sized for dry weather flow and a rainfall rate of approximately 0.02 inches per hour. At that time, it was not considered necessary to design for a larger fraction of storm water based on the concept that the early portion of storms flushed a high percentage of sanitary matter in the sewers and that what overflowed was a dilute mixture containing a small percent of sanitary flow. Massive treatment facilities would have been required to treat the runoff at the high rates generated during storms.

During periods of light rainfall (approximately 0.02 inches per hour), the system operates essentially as in dry weather except for increases in flow. As a result, approximately 32% of the yearly runoff is treated. During heavier rainfall periods, however, when rainfall exceeds 0.02 inches per hour, the flow in the combined sewer system exceeds the 250 MGD hydraulic capacity of the three treatment plants. The excess combined wastewater flow is discharged untreated from 39 outfall structures located around the periphery of the City. In an average year, approximately 82 overflows occur. Although the duration of the overflow period is small--about 2.4 percent of the time in an average year--water quality and beach conditions are affected for days after each overflow. Generally, these overflows cause deposits of waste material on the beaches throughout the winter months.

Wastewater flows from San Francisco in the amount of 36.5 billion gallons per year from domestic and industrial sources and 8.8 billion gallons of storm runoff, totaling 45.3 billion gallons, constitute the annual water mass to be controlled prior to discharge. Of this total, 39.3 billion gallons (bg) are now treated annually and 6 bg overflow directly to receiving water without treatment.

San Francisco receives an average of 20.33 inches of rainfall annually as based upon 62 years of records at the USWB Federal Office Building gauge. On the basis of the 24,500 acres of sewer service area in the City and assuming a runoff cofficient of 65%, there are 8.8 bg of runoff derived from the 20.33 inches of rainfall. Of this amount, about 2/3 drains to the Bay and 1/3 drains to the Ocean. The existing system diverts about 2.8 bg of the total 8.8 bg (approximately 32%) to treatment. The remaining 6 b.g. overflows with approximately 4 b.g discharging to the Bay and the remaining 2 b.g discharging to the Ocean.

The basic concept of the Master Plan, developed as an overall solution to the water pollution problems facing the City, is to provide a higher degree of treatment, an increase in treatment capacity, and a storage system to attenuate storm runoff rates by temporarily storing the runoff for later treatment. This capability offers the opportunity to take full advantage of the total storage capacity in the system which might not otherwise be used due to spatial variations in rainfall and hence runoff.

Existing Sewage System

The existing combined sewerage system must transport, treat and dispose of both dry weather flows and combined wet weather flows. To function under the extreme ranges encountered under the dual regimen of wet weather conditions, the system was originally arranged and sized to accommodate the wet weather flow conditions primarily. Plate 1, following, shows a block diagram of the system.

The City is divided into three sewerage service areas, each of which is presently served by a primary sewage treatment plant.

The three plants are the North Point Water Pollution Control Plant, Richmond-Sunset Water Pollution Control Plant and Southeast Water Pollution Control Plant. The location of each of the plants and its outfall, together with the approximate area it serves, is shown on Plate 2. Within each service area of each plant are varied land uses and population densities.

For further details of the operational features of the SFWWMMP projects under design, the reader is referred to the San Francisco Wastewater Master Plan, Transport-Storage Operational Plan Report by Bureau of Sanitary Engineering Department of Public Works, City and County of San Francisco dated June 1976 from which this General Description has been extracted.

Sewage Treatment at North Point Water Pollution Control Plant (NPWPCP)

The North Point Water Pollution Control Plant serves an area of 7,500 acres. The tributary area includes residential, commercial and industrial land use areas. The plant now provides a chemical primary treatment consisting of pre-chlorination, screening, grit removal, preparation and primary sedimentation with chemical coagulation using ferric chloride and postchlorination. Combined sewage flows exceeding plant capacity when rainfalls exceed 0.02 inches per hour are bypassed directly to San Francisco Bay without any treatment at 17 locations. The primary effluent does not meet the National Pollution Discharge Elimination System (NPDES) and Regional Water Quality Control Board (RWQCB) discharge requirements.

PLATE 1

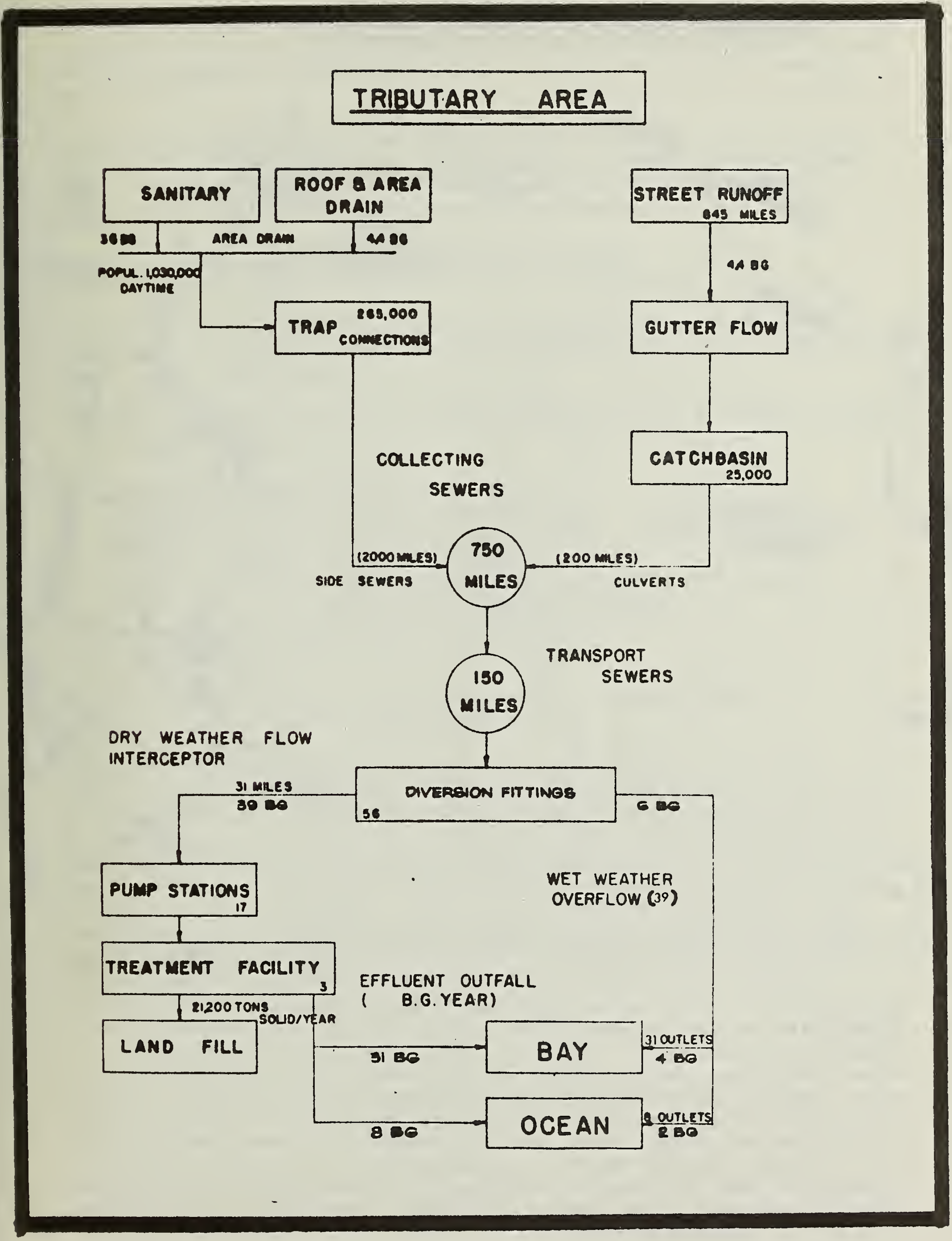
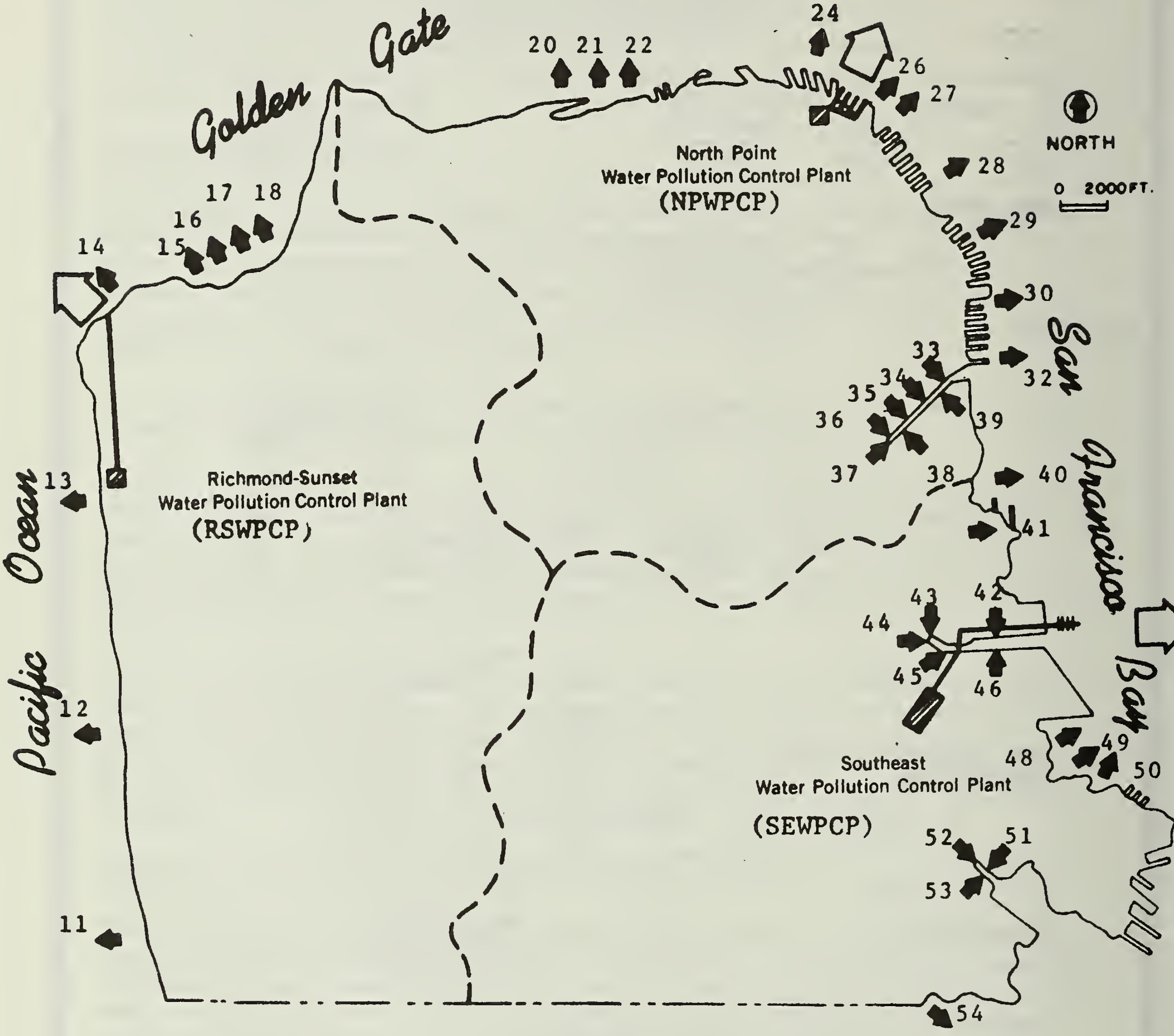

TRIBUTARY AREA
SANITARY
ROOF & AREA DRAIN
STREET RUNOFF
845 MILES
36 BG
AREA DRAIN
4.4 BG
POPUL. 1,030,000
DAYTIME
4.4 BG
TRAP
265,000 CONNECTIONS
GUTTER FLOW
CATCHBASIN
25,000
COLLECTING SEWERS
(2000 MILES)
SIDE SEWERS
750 MILES
(200 MILES)
CULVERTS
TRANSPORT SEWERS
150 MILES
DRY WEATHER FLOW INTERCEPTOR
31 MILES
39 BG
DIVERSION FITTINGS
56
6 BG
PUMP STATIONS
17
WET WEATHER OVERFLOW (39)
TREATMENT FACILITY
3
EFFLUENT OUTFALL
(B.G. YEAR)
21,200 TONS
SOLID/YEAR
LAND FILL
BAY
31 BG
31 OUTLETS
4 BG
OCEAN
8 BG
8 OUTLETS
2 BG

PLATE 2

TREATMENT PLANTS AND OUTFALL LOCATIONS


Golden Gate
20 21 22
24
26
27
NORTH
0 2000 FT.
North Point
Water Pollution Control Plant
(NPWPCP)
28
29
30
San Francisco Bay
33
32
34
35
36
39
37
38
40
41
14
15
16
17 18
13
Richmond-Sunset
Water Pollution Control Plant
(RSWPCP)
Pacific Ocean
12
43
42
44
45
46
49
48
50
Southeast
Water Pollution Control Plant
(SEWPCP)
52
51
53
11
54

Presently the City is divided into three drainage districts (indicated by the broken line) which follow the topographical features of the City. Each of the districts is served by a Water Pollutuon Contol Plant which provides primary treatment with chemical addition before discharge of the effluent through an outfall (represented by the large arrows). Located around the perimeter of the City are 39 bypass locations (represented by the solid arrows) where a combination of untreated domestic wastewater and stormwater overflow into the Bay and Ocean when rainfall exceeds 0.02 inches per hour. Overflows occur approximately 80 times per year.

Numbers adjacent to arrows represent the outfall system reference number which is keyed to Master Plan documents.

The NPWPCP (Plant) has a hydraulic capacity of 190 mgd and an effective capacity of 160 mgd. It processes an average dry weather flow of 60 mgd and after primary treatment discharges the effluent into San Francisco Bay.

Sewage sludge generated at the NPWPCP is treated at the City Southeast Water Pollution Control Plant after transport through a 10-inch force main. The treated sludge is transported under private contract to a disposal site in Mountain View, Santa Clara County.

Plans for Future Expansion of City Sewage Treatment in Bay Side Facilities

Plate 3 indicates the drainage area which is served by the Bay Side facilities, and Plate 4 indicates the areas served by each treatment plant at the present time.

The major Bay Side projects as presently proposed, and as shown on Plate 5 are as follows:

1. North Point Crosstown Transport (NPX)
2. North Shore Outfalls Consolidation (NSOC)
3. Islais Creek Outfalls Consolidation (ICOC)
4. Channel Outfalls Consolidation (COC)
5. Southeast Plant Expansion and Interim Outfall (SEWPCP and IO)
6. North Point Wet Weather Plant Conversion (NPWWPC)
7. Sunnydale-Yosemite Transport-Storage (SYTS)
8. Hunters Point Basin
9. Mariposa Basin
10. North-South Crosstown High Level Transport-Storage (NSHL)
11. Real Time Automatic Control (RTAC)

Project (1) above, the North Point Crosstown Transport is currently under construction. Projects (2), (4) and (5) and a portion of (3) all as included in our present "Accelerated Program" and shown on Plate 5 are under design. Projects (6) through (9) are in the conceptual stage and require an Analysis of Alternatives before adoption as design projects. Project (10) is on the 1976-77 State Project list for Step 1 (Planning) funds amounting to $800,000. Project (11) is being investigated and implemented under separate Federal funding to provide solutions to wet weather control systems, and will apply to the North Shore System initially with subsequent expansion integrating system control on a City-wide basis.

PLATE 3

TOPOGRAPHIC MAP OF SAN FRANCISCO

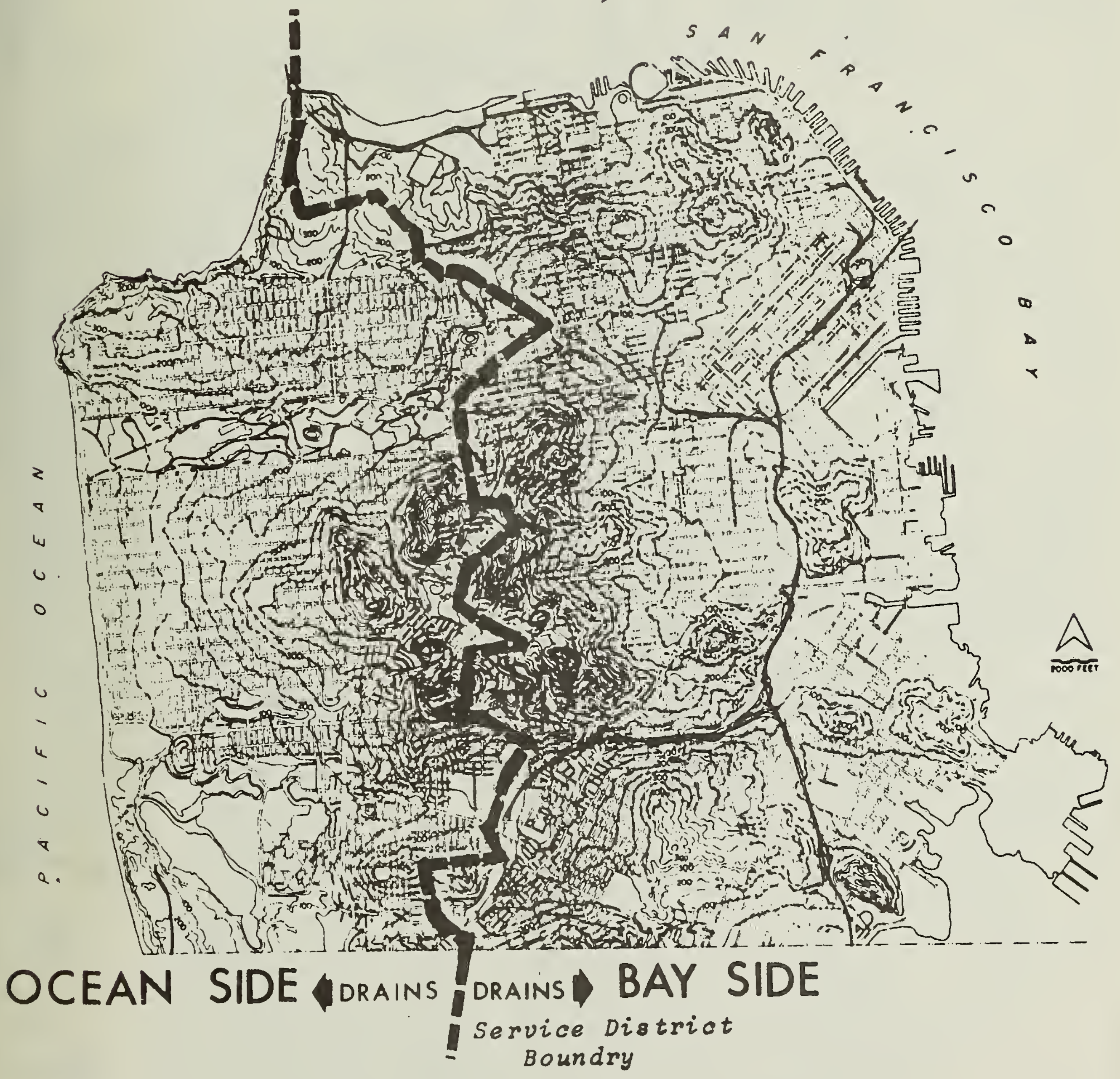

SAN FRANCISCO BAY
PACIFIC OCEAN
OCEAN SIDE
DRAINS
DRAINS
BAY SIDE
Service District Boundry

PLATE 4

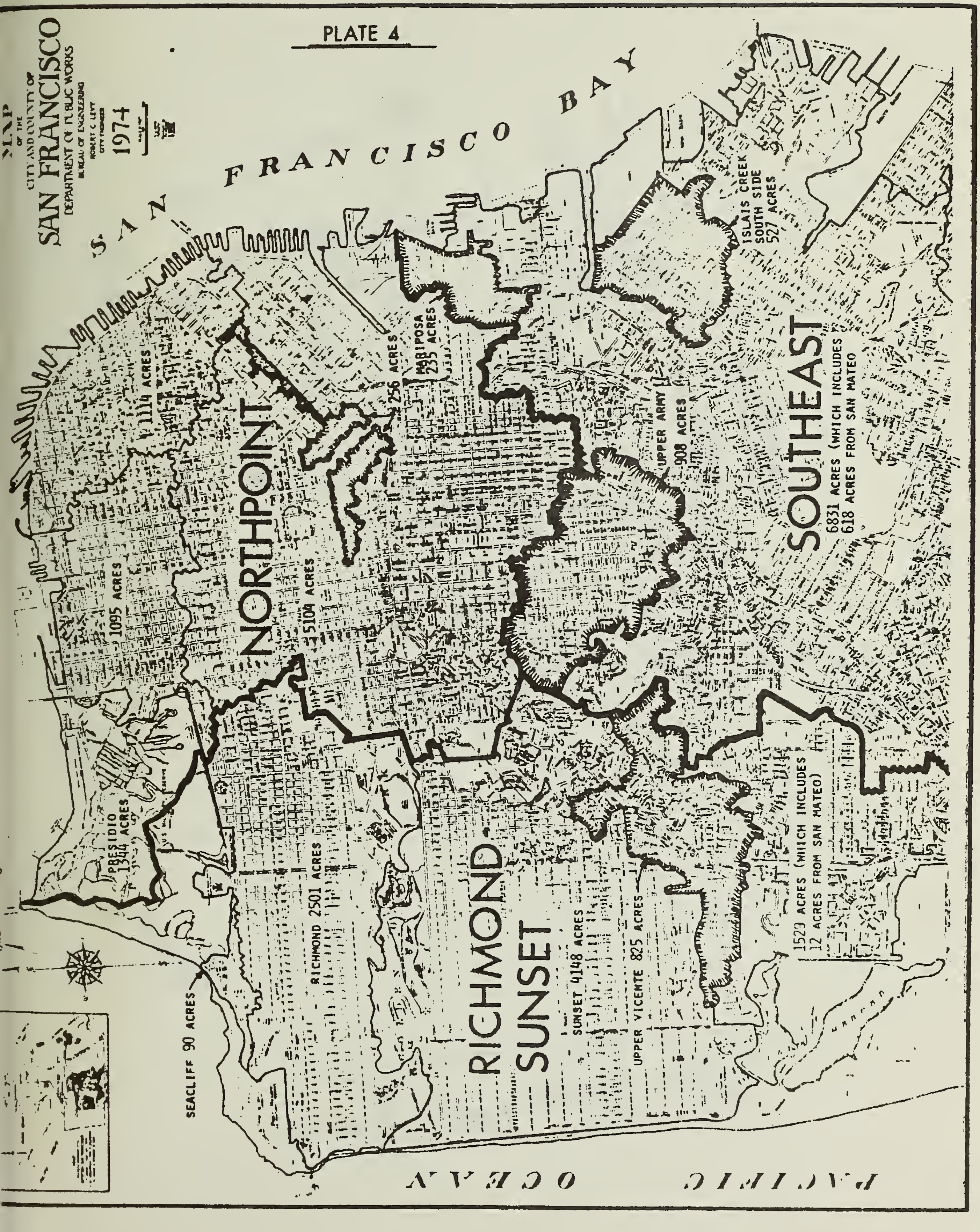
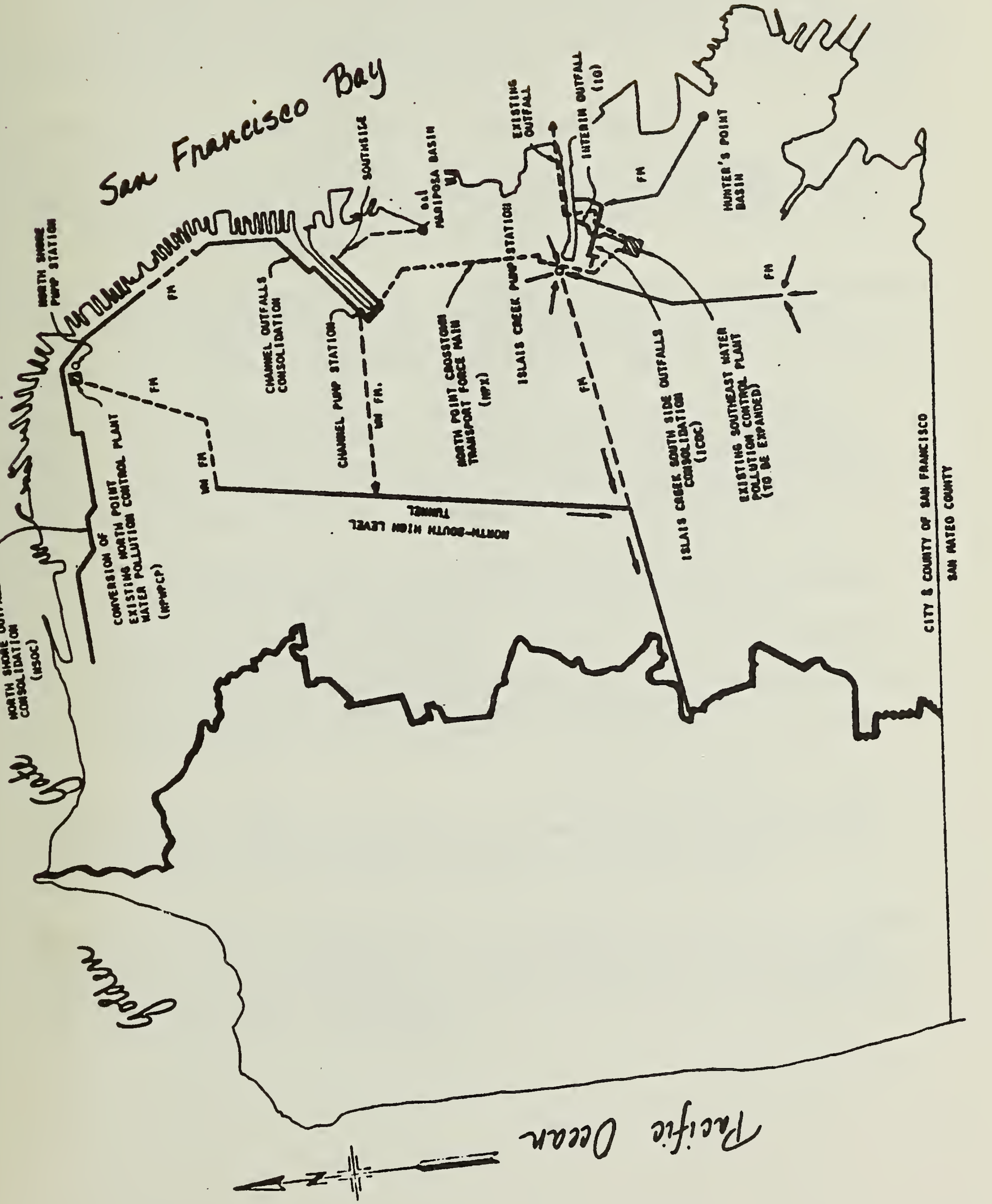

MAP OF THE CITY AND COUNTY OF
SAN FRANCISCO
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
ROBERT C. LEVY CITY ENGINEER
1974
SAN FRANCISCO BAY
PACIFIC OCEAN
NORTHPOINT
5104 ACRES
1095 ACRES
1114 ACRES
256 ACRES
MARIPOSA 235 ACRES
ISLAIS CREEK SOUTH SIDE 527 ACRES
UPPER ARMY 908 ACRES
SOUTHEAST
6831 ACRES (WHICH INCLUDES 618 ACRES FROM SAN MATEO
PRESIDIO 1344 ACRES
SEACLIFF 90 ACRES
RICHMOND 2501 ACRES
RICHMOND SUNSET
SUNSET 4148 ACRES
UPPER VICENTE 825 ACRES
1529 ACRES (WHICH INCLUDES 12 ACRES FROM SAN MATEO)

PLATE 5


San Francisco Bay
NORTH SHORE PUMP STATION
NORTH SHORE OUTFALLS CONSOLIDATION (NSOC)
CONVERSION OF EXISTING NORTH POINT WATER POLLUTION CONTROL PLANT (NPWPCP)
FM
SW FM
CHANNEL OUTFALLS CONSOLIDATION
CHANNEL PUMP STATION
SW FM.
SOUTHSIDE
MARIPOSA BASIN
NORTH POINT CROSSTOWN TRANSPORT FORCE MAIN (NPX)
ISLAIS CREEK PUMP STATION
EXISTING OUTFALL
INTERIM OUTFALL (10)
HUNTER'S POINT BASIN
ISLAIS CREEK SOUTH SIDE OUTFALLS CONSOLIDATION (ICOC)
EXISTING SOUTHEAST WATER POLLUTION CONTROL PLANT (TO BE EXPANDED)
NORTH-SOUTH HIGH LEVEL TUNNEL
CITY & COUNTY OF SAN FRANCISCO
SAN MATEO COUNTY
Golden Gate
Pacific Ocean
N

Further details of plans for expansion of Bay Side City Sewage Treatment facilities can be found in the San Francisco Wastewater Master Plan, Transport-Storage Operational Plan Report by Bureau of Sanitary Engineering, Department of Public Works, City and County of San Francisco dated June 1976 from which this summary was extracted.

Acceptability of Sewage Treatment to Regulatory Agencies

On May 18, 1976 by order 76-78, the California Regional Water Control Board, San Francisco Bay Region, prohibited additional discharges to the sewer system tributary to the North Point Plant by dischargers who did not discharge prior to May 18, 1976.

This prohibition allowed for the execlusion of projects under construction or with building permits issued or projects for which the city had received and completed processing of all documents required by the city for issuance of a building permit before May 18, 1976.

This Order 76-58 amended Order 76-4 requiring the city to cease and desist from discharging wastes contrary to requirements prescribed in Order 74-162, an NPDES Permit and in Resolution 70-16. It was issued after the Board concluded that the city was failing to show substantial progress and accomplishments concerning five factors including:

1. Continued violation of effluent organism requirements.
2. Lack of compliance with time schedules for facilities to provide primary and secondary treatment.
3. Compliance with time schedules for facilities to provide expanded primary and secondary treatment.
4. Progress toward effective implementation of the State Water Resources Control Board - EPA Assessment Team Recommendations.
5. Progress toward review of operation and maintenance of the sewage collection system.

Additional discharges to the City sewer system were prohibited. The prohibition was amended to allow partial removal and permit additional discharges when the city would demonstrate to the Board that they have completed tasks specified in six sections of the Order 76-58.

In July 1976 the Board allowed the city to issue another 46 new building permits for new construction based on progress made in developing and implementing a waste management program to insure the timely completion and operation of those Wastewater Master Plan facilities needed to comply with all NPDES requirements.

Other required Interim Measures are expected to be completed in August 1976. A financial program necessary for planning, design, construction and operation of all facilities needed to comply with this order in the shortest practicable time are expected to be completed in September which is expected to result in continued further lifting of the prohibition and allow the city to continue issuing building permits.

Major progress was considered to have been made when the San Francisco Board of Supervisors placed a $240 million sewer improvement bond on the ballot for November 1976.

Potential Impacts

1. Environment on the Project. None

2. Project on the Environment.

   A) Minor, long-term, negative impacts on the City sewage system will result with the construction of the Project from the estimated sewage flow of 0.05 mgd entering the 21-inch City sewer on Sacramento Street and the North Point Water Pollution Control Plant (NPWPCP).

      The estimated sewage flow of 0.05 mgd constitutes 0.12% of the 41.4 mgd capacity of the Sacramento Street Sewer and 0.03% of the 160 mgd effective treatment capacity in the NPWPCP. It constitutes 0.08% of the 60 mgd average dry weather flow in the NPWPCP. These impacts are considered of minor significance.

   B) A minor, short-term negative impact on existing residents in the Project area may be expected during construction of the sewers to serve the project.

Mitigation of Significant Impacts

None recommended.

PUBLIC SERVICES

1. Fire

No adverse effect on the resources and capabilities of the San Francisco Fire Department is anticipated as a result of this Project.

The tower will be constructed in accordance with Type I classification of the San Francisco Building Code, the most fire-resistant construction classification in the Code. Sprinklers will be provided by the developer as required. These measures will minimize potential life hazard in the proposed Project.

The following is quoted from a letter from Gerald K. Lee of Architects Associated: "During the schematic stages of the design, many alternatives were proposed to satisfy the Fire Department requirements for establishing the Plaza level as datum. The only solution acceptable to the Fire Department allows equipment and water trucks access to the deck so that ladders might be rigged against the family buildings. Egress for the fire trucks is also mandatory and a clear turn around on the Plaza is the only solution because Pratt Place and Joice Street are not wide enough for the Fire Department trucks." "The fire truck ramp, a one-foot change of grade from sidewalk level" (on Sacramento Street) "to the Plaza level, is also the main pedestrian way to the project, and can easily be closed off (with removable posts) to any vehicles except in the case of fire." The fire truck turnaround on the Plaza level is shown on the plan of Architects Associated.

The Fire Department has several stations in the immediate area which would respond to a first alarm fire in Chinatown: Station #2 at 1340 Powell Street; Station #13 at 530 Sansome Street and Station #28 at 1814 Stockton Street, Engine companies would also be called in from other parts of the city if needed.

2. Police

For police protection, the project area is served by Central Station at 766 Vallejo Street, six blocks from the site.

The crime rate for the project area in April 1974 was one incident per year for every 16 persons. The Police Department is converting to a new system of computation for crime rate figures and more recent figures for this small area are impossible to isolate from the Central Station statistics, which cover a wide geographical area. According to a Police Department spokesman, there has been a 35% increase in crime in San Francisco within the past year. Therefore, if we apply this City-wide increase to the Project area, a rough figure for the yearly crime rate might be assumed to be close to one incident for every 11 persons.

The Police Department earlier made recommendations for crime prevention features to be included in the design of the Project. These include: Deadbolt locks; solid wood entry doors; recessed corridor lighting devices with locking screws; exterior elevator lobby visible from the street; no internal hallways; wrought iron railings (for better visibility); secured garage facilities; individually keyed mailboxes; utilization of a central courtyard for laundry facilities and play area. The developer will incorporate into the design of the buildings all of the Police Department recommendations.

A spokesman for Architects Associated has said that in addition to these features, the developer has tried to make the Project visually open to the street and to the view of others living within the Project. Visitors to the tower for the elderly will be controlled from a desk in the lobby. There will be an intercom system in the tower. Windows will expose the hallways to the outside. These design features, built into the Project, should maximize the safety of the residents.

Conclusion: No adverse effect on police facilities or resources is expected to result from the Project.

3. Medical Services

Health facilities which would most likely be patronized by the residents of the Project include the following:

- District Health Center #4, 1490 Mason at Broadway operated by the San Francisco Department of Public Health. This facility serves the entire district bounded by Van Ness Avenue and south of Market. Offers preventive medical services, including health education, information and referral, public health nursing, school health program, mental health consultation, immunization, family planning program, cancer screening and dentistry for children. Has some bilingual staff.

- Northeast Medical Center (NEMS) at 615 Grant Avenue is funded by HEW, Medical and Medicare. Has some 7300 active registered patients, about 90% of whom are from Chinatown. Formerly subsidized through State for poverty level, it now charges on a sliding scale. Offers comprehensive medical and basic dental programs on outpatient basis with clinics and some lab work. For serious matters, referrals are made to hospitals: Chinese Hospital, University of California Medical Center and San Francisco General. Chinatown and North Beach are the target area for this facility.

- Northeast Mental Health Center at 1548 Stockton Street is supported by Federal, State and City funds. It has about 400 active patients, 13 years or older. Provides outpatient and outreach services. Home visits are made if necessary. Chemotherapy treatment is given. Serves mostly Asians, about 50% from Chinatown.

Branches, supporting teams of the Northeast Mental Health Center are as follows:

a) Chinatown Community Care (formerly the Northeast Community Mental Health Day Treatment Center) at 799 Pacific Avenue. Provides group care of a short-term nature to some 130 patients, adults 18 or over.

b) Chinatown Aftercare at 615 Grant Avenue has 75 adult clients on its active list. These are mostly chronically and Long-term ill. This center works in conjunction with Napa State Hospital. It provides day treatment in a group program.

Two services with a specialized clientele are:

- Chinatown-North Beach Family Planning Services, Inc. at 511 Columbus Avenue provides an eductional program for all ages and a clinical program (a workload of about 85 weekly) for 25 years and under; between 70 and 75% are Chinatown residents.
- On Lok Senior Citizens Program, funded mostly by HEW, operates a center at 831 Broadway which provides comprehensive program for care of the elderly, including day care (with medical orientation) transportation to services needed, occupational therapy and a meal program to about 150 clients.

4. Hospitals

The hospital most apt to be patronized by residents of Mei Lun Yuen is Chinese Hospital at 835 Jackson Street. It is funded by Chinese family associations with fees on a sliding scale. It has a 60-bed capacity. As has been mentioned earlier, some patients, especially those with serious illnesses, may also be referred to the University of California Medical Center or San Francisco General Hospital.

5. Ambulance Service

San Francisco is one of very few cities that owns and operates its own ambulance service, which is available free to all residents. The Police and Fire Departments radio emergency service for an ambulance when there is a need for one.

Conclusion: Although most of the medical facilities described above are operating at or near capacity, it is not estimated that the Chinatown Project (because of its relatively small size) will cause any significant negative impact on them.

WATER SUPPLY

Description

The Mei Lun Yuen project is expected to have an estimated population of 384 persons at full occupancy. Based on an average daily water use reported for this area of San Francisco of approximately 125 gallons per capita per day, the water consumption from the project is estimated to be 48,000 gallons per day or 0.048 million gallons ger day (MGD) rounded to 0.05 MGD.

Water service will be provided by the San Francisco Water Department (SFWD) through their City Distribution Division from the Lombard Reservoir which has a total capacity of 2.7 million gallons (MG). This reservoir is located at Greenwich and Hyde Streets, 1 1/4 miles north-west of the project at an elevation of 306 feet.

Water Service Facilities

Water service to the project will be provided from the existing 6-inch cast iron main in Sacramento Street at elevation 160 feet (approximately). Pressure in the main, furnished by gravity from the Lombard Reservoir is a maximum of 58 pounds per square inch (psi).

Booster pumps and storage facilities will be required to provide minimum 25 psi pressure in the 13 story tower with top elevation of 265 feet.

Detailed design plans of the water supply approved by the City Water Department will be required for review to determine acceptability. An existing 18-inch diameter water main is also available in Sacramento Street to provide fire fighting capability. This water system is owned and operated by the San Francisco Fire Department (SFFD).

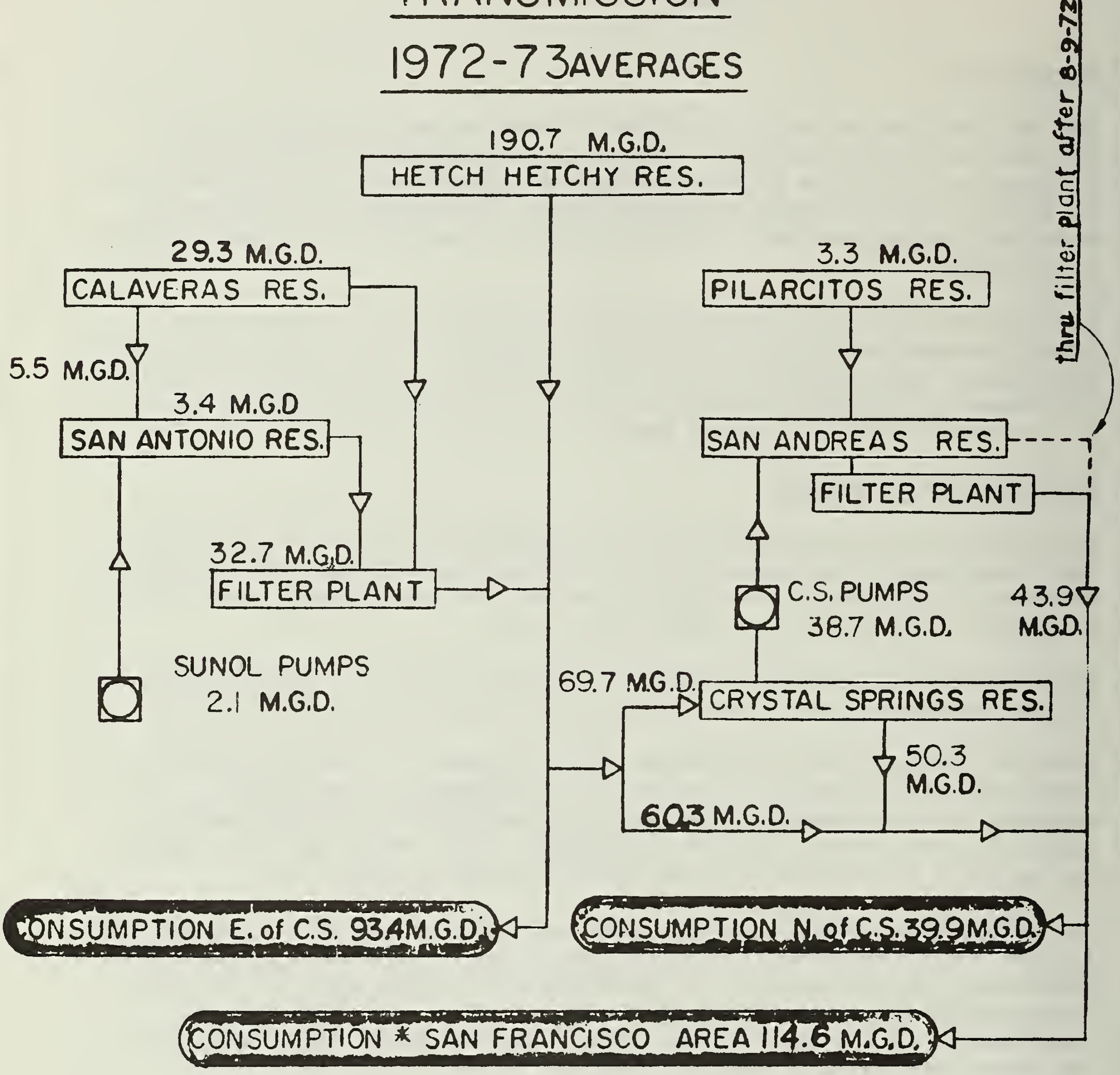
The SFFD shall provide assurance that water supply facilities are adequate to meet their requirements establishing flows for a primary fire of 5000 gallons per minute (gpm) and a simultaneous secondary fire of 2500 gpm. Final design and construction of the water system will have to meet requirements of the San Francisco Water Department and Fire Department for water service which must be adequate for both domestic and fire fighting purposes to supply the project.

All services are to be metered by SFWD to each dwelling unit in the project.

FIGURE 2

TRANSMISSION

1972-73 AVERAGES


190.7 M.G.D.
HETCH HETCHY RES.
29.3 M.G.D.
CALAVERAS RES.
5.5 M.G.D.
3.4 M.G.D
SAN ANTONIO RES.
32.7 M.G.D.
FILTER PLANT
SUNOL PUMPS
2.1 M.G.D.
3.3 M.G.D.
PILARCITOS RES.
thru filter plant after 8-9-72
SAN ANDREAS RES.
FILTER PLANT
C.S. PUMPS
38.7 M.G.D.
43.9 M.G.D.
69.7 M.G.D.
CRYSTAL SPRINGS RES.
50.3 M.G.D.
60.3 M.G.D.
CONSUMPTION E. of C.S. 93.4 M.G.D.
CONSUMPTION N. of C.S. 39.9 M.G.D.
CONSUMPTION * SAN FRANCISCO AREA 114.6 M.G.D.

* Includes 47 sq. mi. San Mateo County

TOTAL SUBURBAN	133.3	M.G.D.
SAN FRANCISCO	114.6	M.G.D.
SYSTEM TOTAL	247.9	M.G.D.

Description of Water Supply by SF Water Department

Water is supplied to the Lombard Reservoir by gravity from the Sunset Reservoir at elevation 385 feet. Capacity of the Sunset Reservoir is 176 million gallons (mg).

Water is supplied to the Sunset Reservoir by the Lake Merced Pumping Station fed by gravity from Lower Lake of Crystal Springs Reservoir.

The Hetch Hetchy aquaduct system from the Tuolumne River in the Sierra Nevada Mountains is the primary source of supply to Crystal Springs Reservoir.

Figure 1 indicates the total water transmission of the SFWD for 1972-73. Over 75% of the water supply shown delivered to consumers in Alameda, Santa Clara, San Mateo and San Francisco City and County was imported from Hetch Hetchy reservoirs on the Tuolumne River in the Sierras. The balance is from Bay Area sources. The total average water consumption for the San Francisco area in 1972-73 was 114.6 MGD and for San Francisco County was 96.7 MGD.

Water supplied by SFWD receives continuous disinfection by chlorination throughout the year with no water exposed to contamination from the point of final chlorination to the consumer's services. The Lombard Pump chlorinates water supplied from Lombard Reservoir to the mains supplying the project. All new distribution mains in the City are required to be disinfected before they are placed in service.

Quality of the Water Supply

Chemical and bacteriological quality of the water supplied by the SFWD from the Lombard Reservoir meets California State Department of Health and United States Public Health Service Drinking Water Standards. The SFWD provides water supply under permit from the California State Department of Health who routinely monitors the quality of water service. The SFWD operates under jurisdiction of the California State Public Utility Comission who assures the continuity of service at reasonable rates required by HUD for acceptable water Service.

Anticipated Impacts

1. Environment on the Project. None

2. Project on the Environment.
   A minor, long-term, negative impact on the San Francisco Water Department water supply from Lombard Reservoir can be expected. The average daily water demand of the Project is 0.05 mgd or 1.85% of the 2.7 mg capacity of the Lombard Reservoir. An even less minor long-term, negative impact can be expected to be caused by the Project water demand of 0.05 mgd on the total SFWD water supply facilities. The 0.05 mgd water demand from the Project constitutes 0.05% of the 96.7 mgd average daily water consumption for San Francisco County served by SFWD for 1972-73.

Mitigation of Potential Adverse Impacts

1. The water demand of the Project is not considered to be of significant impact on the SFWD water supply facilities to recommend mitigating measures be taken.

2. Adverse impacts on the environment during construction of the water supply facilities connecting to existing water mains in Sacramento Street can be mitigated by coordination of construction between the builder and the SFWD and supervision and inspection of work by the City Building Department to abate construction impacts.

SOILS - GEOLOGY - SEISMIC

SOILS

This site is roughly rectangular in shape. The ground surface slopes downward and northeasterly from Elevation 180 near southwest corner to 130 feet near the northeast corner. The northern end of the Stockton tunnel extends nearly 1/3 of the eastern property boundary.

The surface coils encountered by the soils investigation of Geotechnical Engineers in August 75 were generally 2-16 feet of medium dense sandy fill overlying alluvial deposits. This fill contains bricks and other debris. The alluvial deposits consist of salty sand and plastic silty-sandy clay. Four borings from depths of 29 to 51 feet were drilled to samples underlying materials. Locations of these borings were made as shown on Figure 1.

The alluvial deposits grade into graywacke sandstone and shale. Only graywacke sandstone is encountered in Borings 1 and 2 to the maximum depths explored of 29.5 and 34 feet. Below a depth of 5 to 22 feet of surface soil deposits encountered in Borings 3 and 4, massive, weathered, and relatively hard but fratured graywacke sandstone is encountered to depths of 49.5 and 33.5 feet. Below these depths, highly sheared, gray to black shale and graywacke sandstone are encountered to the maximum explored depths of 51.1 and 50 feet. An interpretive subsurface profile taken along the section indicated on the attached Site Plan is shown on Figure 2.

The bedrock strata are believed to dip at an angle of 40 to 45 degrees to the northeast in accordance with the panar elements observed in the cored samples and with the regional data.

Free ground water was encountered in two borings at depths of 6 and 25 feet.

There has been much published soils and geological data in previous developments in the vicinity of this site. This data is available from the City Planning Commission with some of the developments as follows:

(1) Stockton Tunnel
(2) Fairmont Tower on Powell
(3) Portola Tower - 980 Sacramento Street
(4) Carson House structure - 920 Sacramento Street
(5) Condominium - 714 Stockton Street.
(6) Royal Standard Court Hotel on Powell

Experience of these developments indicates the following.

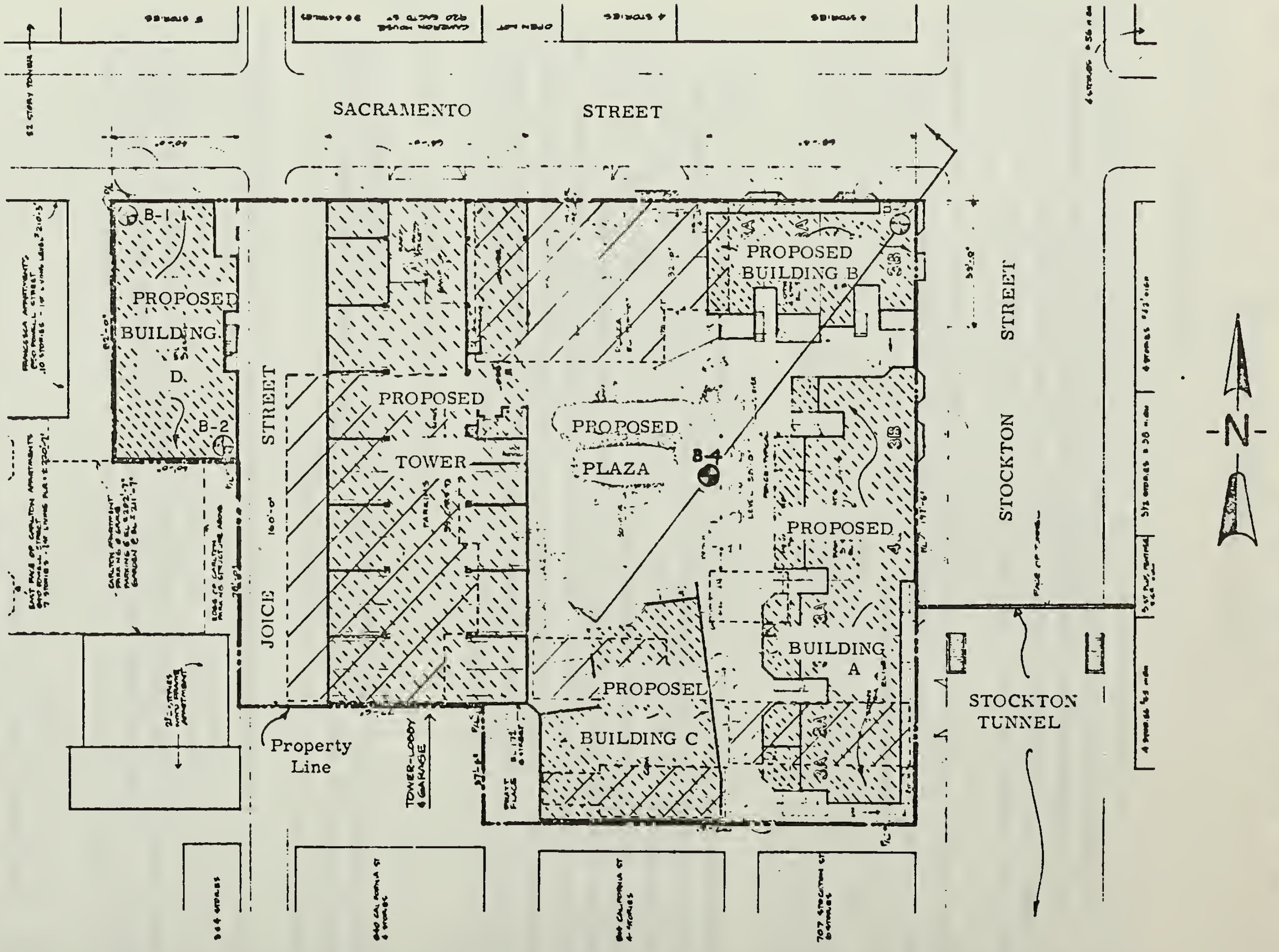
LEGEND

⊕ B-4 APPROX. BORING LOCATIONS

—·-·— PROPERTY LINE

▨ EXISTING BUILDING

REFERENCE: LANDSCAPE PLAN
PREPARED BY
ARCHITECTS ASSOCIATED
DATED 6-30-75
SCALE: 0 50
(FEET)


SACRAMENTO STREET
STOCKTON STREET
JOICE STREET
STOCKTON TUNNEL
PROPOSED BUILDING B
PROPOSED BUILDING A
PROPOSED PLAZA
PROPOSED TOWER
PROPOSED BUILDING C
PROPOSED BUILDING D
B-1
B-2
B-4
Property Line
TOWER-LOBBY & GARAGE
-N-

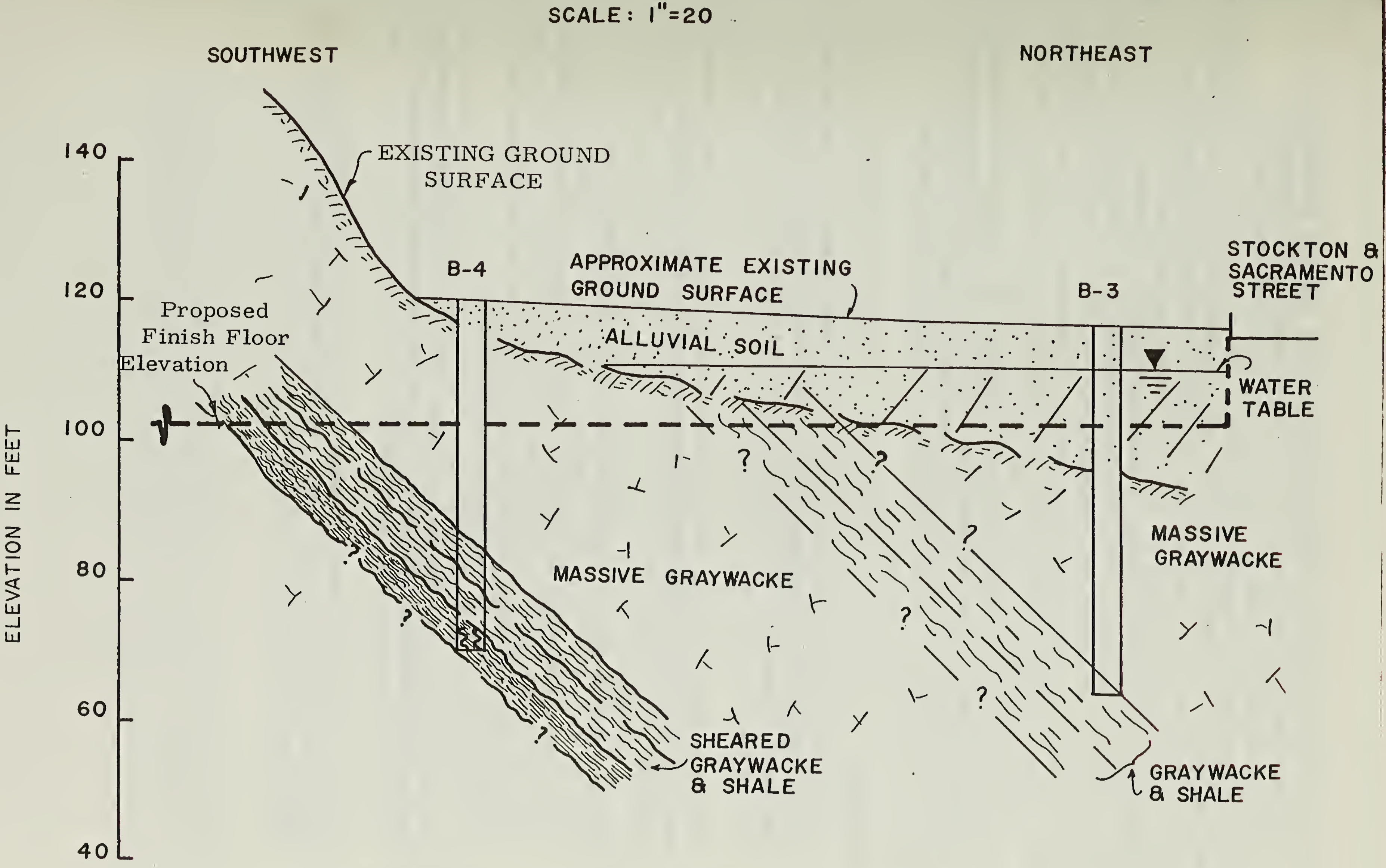
SITE PLAN

PROJECT 102-1

ASSOCIATED GEOTECHNICAL ENGINEERS

AUGUST . 1975

FIG. 1


SCALE: 1"=20
SOUTHWEST
NORTHEAST
ELEVATION IN FEET
140
120
100
80
60
40
EXISTING GROUND SURFACE
Proposed Finish Floor Elevation
B-4
APPROXIMATE EXISTING GROUND SURFACE
ALLUVIAL SOIL
B-3
STOCKTON & SACRAMENTO STREET
WATER TABLE
MASSIVE GRAYWACKE
MASSIVE GRAYWACKE
SHEARED GRAYWACKE & SHALE
GRAYWACKE & SHALE
?

INTERPRETIVE GEOLOGIC CROSS-SECTION

PROJECT 102-1

ASSOCIATED GEOTECHNICAL ENGINEERS

AUGUST 1975

FIG. 2

Subsurface materials in the above-developed sites consist generally of fill, natural soil deposits and rocks of the Franciscan Formation, consisting sandstone and shale. These structures are supported on spread footings and/or caisson foundations. The rocks could be excavated by heavy ripping and backhoe equipment, supplemented by localized blasting. Vertical or near vertical excavations were made and made in a series of stages if adjoining buildings existed. Tie-back anchors were installed as excavations proceeded. Soldier beam with lagging system were used to provide temporary shoring. The rocks were generally divided into fractured and sheared ones for design and construction purposes. Surface bedrock contours could not be accurately evaluated. No unusual construction problems were encountered except for the construction of Stockton Tunnel.

On the basis of the soils data reviewed, the site is suitable for development but only under careful supervision of soils, geologic engineers and structural engineers. Construction will be in accordance with HUD Handbook 4140.3 change 1, 4140.1 and 4541.1 and the applicable MPS.

Soils Impacts

(1) The limited soil investigation discloses hetrogeneous fill materials over a large portion of the site. This material without further study should not be used as any table bearing material. This may require removal from the site.

(2) The low shear strengths and high compressible nature of the alluvium must be carefully controlled during construction or foundation problems will result.

(3) Ground water will be a problem unless carefully controlled.

(4) Seepage along bedding planes will require special foundation design.

(5) The placing of lightly loaded structures should not be allowed to be built partially on cut and partially on fill.

(6) The sandy clay materials found on this site are moderately expansive and construction must follow HUD Region IX standards for expansive materials dated September 1, 1975.

(7) All structural and non-structural retaining walls will require subsurface drainage protection to control moisture and eliminate high fluid pressures.

(8) Foundation designs will vary on the same buildings such as piling and spread footings. Anticipated loads and settlement must be carefully coordinated.

(9) Dust and siltation will exist during construction due to soil type and prevailing wind conditions.

(10) Rock faces will leave scars on the landscape which are almost impossible to eliminate.

GEOLOGY

The evolution of the San Francisco Bay region is characterized by a long, complex record of extensive earth movement and seismic activity. The area has been further complicated by sea level changes related to Pleistocene glaciation and erosion by running water. From a geologic point of view, the Bay Area is considered young.

Within the region are several major active faults capable of generating large magnitude earthquakes. For example, the San Andreas Fault is located to the west of the site and has produced an 8-plus magnitude earthquake in historic times (the 1906 earthquake). The Hayward Fault to the east is also active, and has originated large earthquakes and associated surface displacement (1886).

The site lies on the northeast flank of Nob Hill, a projecting mass of bedrock consisting of shale and graywacke sandstone of the Franciscan Formation. Although the rocks are not well exposed and the geologic structure is poorly understood, Nob Hill is one of a group of five hills composed of predominantly shale and sandstone. These hills lie northeast of a major shear or fault zone, termed the Fort Point - Potrero Hill - Hunters Point Shear Zone, as shown by U. S. Geological Survey. The rocks in the vicinity of the site are therefore more competent than those immediately to the southwest within the indicated shear zone.

On a more localized level, Nob Hill and its vicinity are on the southwest limb of a downfold or syncline termed the Columbus Avenue Syncline. The rock beds in the vicinity of the site trend or strike northwest-southeast and dip at a moderate to steep angles to the northeast.

Geological Impacts

1. Due to pressure of critical shear zones competence of rock for foundation should be established.

2. Due to the adverse orientation and dip of the bedding planes rock cut slopes will differ throughout the site. Designers must provide tie back anchor system which differ over the site. These are costly and must be carefully supervised by competent soils engineer.

Seismicity

The seismic hazard of the San Francisco area is great and well known, and seismic activity is high. All shear zones shown on Figure 2 are evidently geologically ancient and considered inactive.

Damaging earthquakes occurred in 1836, 1838, 1865, 1868, and 1906, and more recently in 1957, originating along the San Andreas and related faults. Records of damages are scant in 1836 and 1838; extensive damages were reported during the 1865, 1868, and 1906 earthquakes.

The seismic ground response of this bedrock area such as the project site is indicated to be highly favorable in respect to the amount of damage caused from ground motion. On the basis of recent technology, it is reasonable to assume that the proposed development will be subjected to at least one moderate to severe earthquake during its design life. During such an earthquake, the danger from fault offset through the site is remote, but strong shaking of the site is likely to occur. The anticipated ground acceleration may be high, and the resulting interaction between foundation supporting bedrock and response of the various planned structures will have to be incorporated in the design. Development therefore must conform to our seismic standards HUD Handbook 4541.1 dated 11/1/73 to mitigate potential seismic impacts.

HYDROLOGY AND FLOOD DRAINAGE

Climate:

San Francisco is an air conditioned city with cool, pleasant summers and mild winters. This climate results from its unique location as the only sea level entrance through the coastal mountains into the interior of California.

As a result of the steady sweep of air from the Pacific Ocean (at an annual mean speed of 9 miles per hour), there are few extremes of heat or cold. During 90 years of records, temperatures have risen to 90 degrees (F) or higher on an average of once a year and dropped below freezing less than once a year. The highest recorded temperature was 101 degrees and the lowest recorded was 27 degrees. The average daily temperature through the year ranges from 45 degrees in January to 69 degrees in September. As a rule, abnormally warm or cool periods last only a few days.

Climatic differences exist within the City of San Francisco, depending on the hills and the geolographical relationship to the Ocean and Bay. The most obvious difference is the greater frequency and duration of fog along the Pacific side of the City.

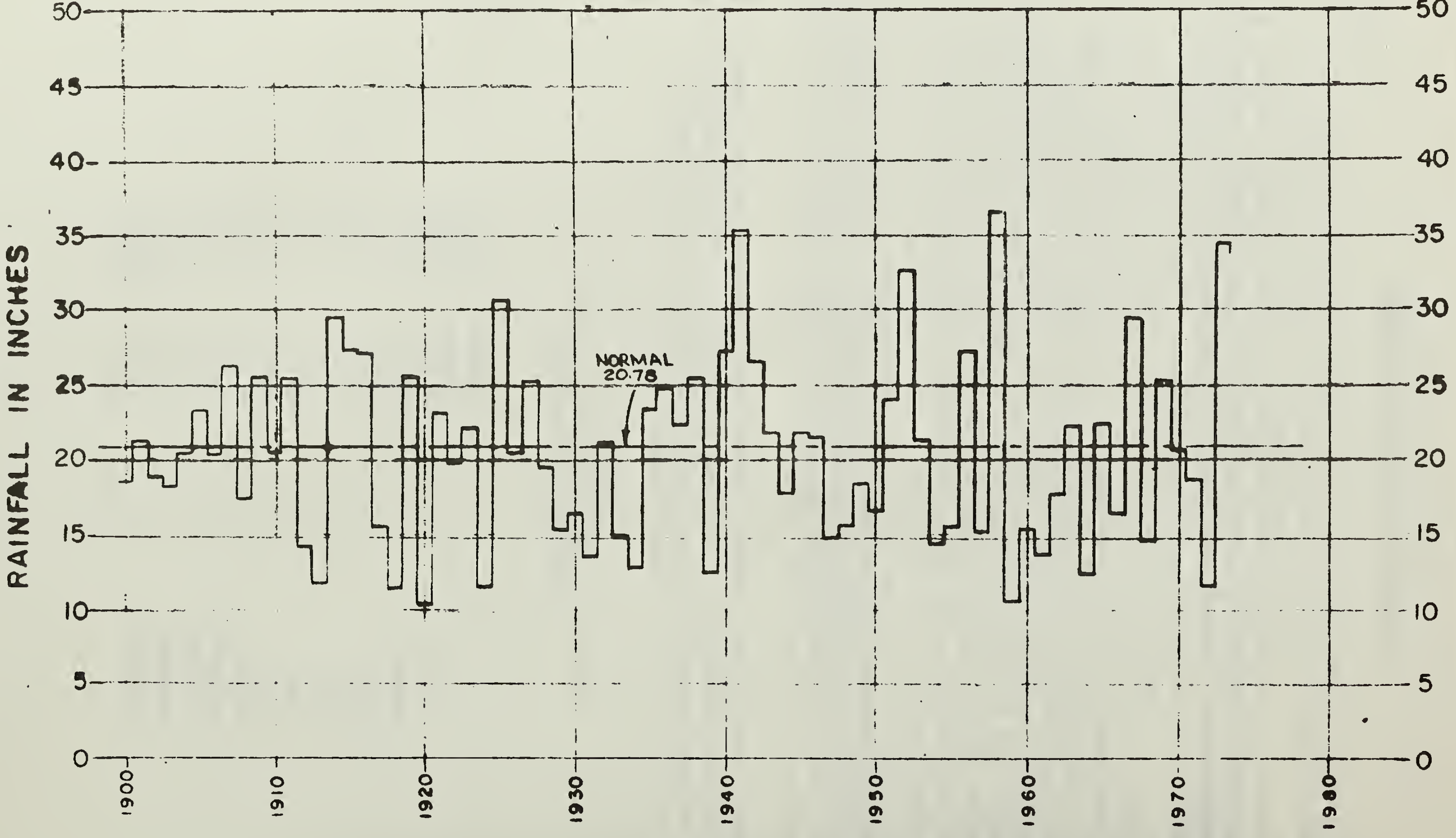
The normal total annual rainfall within San Francisco is approximately 20 inches (see Exhibit 2). As shown in Exhibit 1, 84% of the total annual rainfall generally occurs during the period from November to March, and 42% generally occurs during December and January.

EXHIBIT 1
ANNUAL AND MONTHLY RAINFALL VARIATION
FEDERAL BUILDING GAGE

	Amount Inches	% of Annual
January	4.57	22.5
February	3.36	16.5
March	2.80	13.8
April	1.43	7.0
May	0.59	2.9
June	0.14	0.7
July	0.02	0.1
August	0.02	0.1
September	0.24	1.2
October	0.89	4.5
November	2.24	11.0
December	4.03	10.8
Total	20.33	100.0

EXHIBIT 2

SEASONAL RAINFALL
FOR
SAN FRANCISCO



Report of the San Francisco Water Department Fiscal Year 1972-1973, page 19

Exhibit 2 shows the seasonal rainfall for San Francisco in inches for the years 1900-1973. In this time period, the normal annual rainfall amounts to 20.78 inches.

CLIMATIC IMPACTS: No adverse impacts are anticipated.

DRAINAGE & FLOODING

The City of San Francisco has a "combined" sewer system, wherein domestic sewage and industrial wastes are conveyed in the same sewer conduits as stormwater runoff. The City's present wastewater collection and treatment system consists of approximately 1,000 miles of sewer lines (ranging in size from 8-inch diameter pipes to a multi-barrel sewer 10-feet high and 40-feet wide), three (3) primary treatment plants, and related pumping stations, diversion structures, and outfall lines.

The City's first sewers were constructed in 1850, and approximately 700 miles of sewer lines were in place by 1935. In 1935, a revised Master Plan was implemented which divided the City into three major Districts (basic drainage basins) and proposed construction of a treatment plant for each District. The Richmond-Sunset Sewage Treatment Plant was constructed in 1939 and subsequently enlarged in 1948 and 1966. The North Point and Southeast Plants were completed in 1951. Facilities adequate for conveying all the dry weather wastewaters to the three plants become available in 1966.

There are three basic deficiencies to the City's combined sewer system as it presently exists. These are:

(1) Approximately 50% of all sewer lines are undersized, lacking capacity to accomodate the runoff from the design storm having a 5-year recurrence interval.

(2) Effluent from the treatment plants do not meet present water quality requirements or provisions of the 1972 Federal Water Pollution Control Act.

(3) When rainfall intensities exceed 0.02 inches per hour throughout the City, the combined plant capacity of 250 million gallons is exceeded and wastewaters are discharged directly to the Bay or Ocean at 41 separate outfalls along the City's shoreline.

The California Regional Water Quality Control Board, San Francisco Bay Region, has long been concerned with the deficiencies in the City's wastewater treatment system. They have caused numerous cease and desist orders and temporary building permit moratoria to be issued over this period.

The Wastewater Master Plan for the City of San Francisco

The following description of the wastewater master plan has been extracted from the "Final-Transport-Storage Operational Plan Report Bureau of Sanitary Engineering, Department of Public Works, City and County of San Francisco - June 1976." For detailed operational details, consult above report.

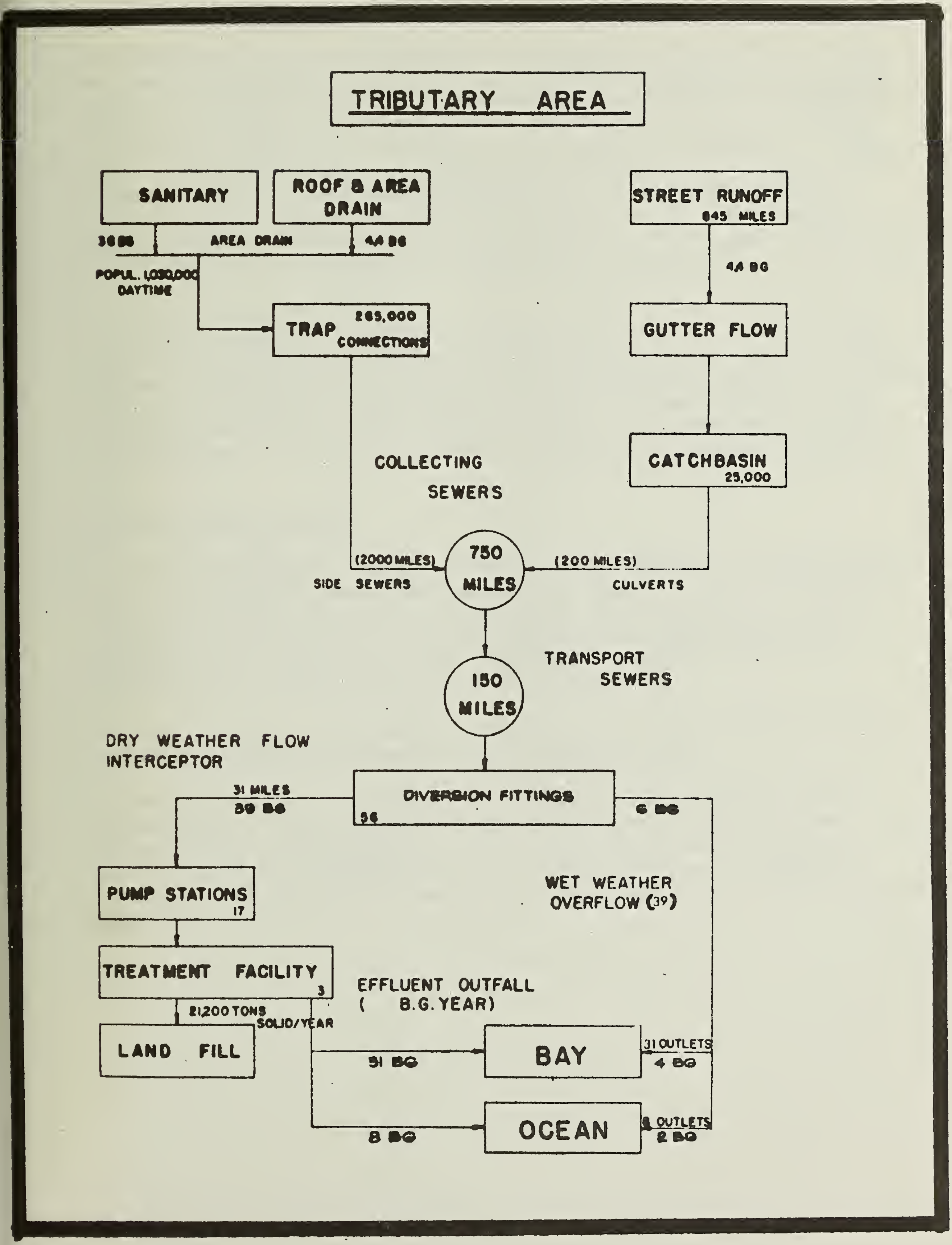
Improvements have been made to the City's sewerage system by the construction of three sewage treatment plants and a collection system consisting of interceptor sewers and pumping stations to intercept the dry weather flows which were discharging to the Bay and Ocean through shoreline outfalls. Because of cost considerations, the treatment plants and intercepting systems were sized for dry weather flow and a rainfall rate of approximately 0.02 inches per hour at rainfall rate of approximately 0.02 inches per hour. At that time, it was not considered necessary to design for a larger fraction of storm water based on the concept that the early portion of storms flushed a high percentage of sanitary matter in the sewers and that which overflowed was a dilute mixture containing a small percent of sanitary flow. Massive treatment facilities would have been required to treat the runoff at the high rates generated during storms.

During periods of light rainfall (approximately 0.02 inches per hour), the system operates essentially as in dry weather except for increases in flow. As a result, approximately 32% of the yearly runoff is treated. During heavier rainfall periods, however, when rainfall exceeds 0.02 inches per hour, the flow in the combined sewer system exceeds the 250 MGD hydraulic capacity of the three treatment plants. The excess combined wastewater flow is discharged untreated from 39 outfall structures located around the periphery of the City. In an average year, approximately 82 overflows occur. Although the duration of the overflow period is small--about 2.4 percent of the time in an average year--water quality and beach conditions are affected for days after each overflow. Generally, these overflows cause deposits of waste material on the beaches throughout the winter months.

Wet Weather Problem Analysis

Wastewater flows from San Francisco in the amount of 36.5 billion gallons per year from domestic and industrial sources and 8.8 billion gallons of storm runoff, totaling 45.3 billion gallons, constitute the annual water mass to be controlled prior to discharge. Of this total, 39.3 billion gallons are now treated annually and 6 billion gallons overflow directly to receiving water without treatment.

EXHIBIT 3


TRIBUTARY AREA
SANITARY
ROOF & AREA DRAIN
STREET RUNOFF
845 MILES
36 BG
AREA DRAIN
4.4 BG
POPUL. 1,030,000
DAYTIME
4.4 BG
TRAP
265,000
CONNECTIONS
GUTTER FLOW
CATCHBASIN
25,000
COLLECTING
SEWERS
(2000 MILES)
SIDE SEWERS
750
MILES
(200 MILES)
CULVERTS
TRANSPORT
SEWERS
150
MILES
DRY WEATHER FLOW
INTERCEPTOR
31 MILES
39 BG
DIVERSION FITTINGS
56
6 BG
PUMP STATIONS
17
WET WEATHER
OVERFLOW (39)
TREATMENT FACILITY
3
EFFLUENT OUTFALL
(B.G. YEAR)
21,200 TONS
SOLID/YEAR
LAND FILL
BAY
31 BG
31 OUTLETS
4 BG
OCEAN
8 BG
8 OUTLETS
2 BG

San Francisco receives an average of 20.33 inches of rainfall annually as based upon 62 years of records at the USWB Federal Office Building gauge. On the basis of the 24,500 acres of sewer service area in the City and assuming a runoff coefficient of 65%, there are 8.8 billion gallons of runoff derived from the 20.33 inches of rainfall. Of this amount, about 2/3 drains to the Bay and 1/3 drains to the Ocean. The existing system diverts about 2.8 billion gallons of the total 8.8 billion gallons (approximately 32%) to treatment. The remaining 6 billion gallons overflows with approximately 4 billion gallons discharging to the Bay and the remaining 2 billion gallons discharging to the Ocean.

The basic concept of the Master Plan, developed as an overall solution to the water pollution problems facing the City, is to provide a higher degree of treatment, an increase in treatment capacity, and a storage system to attenuate storm runoff rates by temporarily storing the runoff for later treatment. This capability offers the opportunity to take full advantage of the total storage capacity in the system which might not otherwise be used due to spatial variations in rainfall and hence runoff.

Existing Sewage System

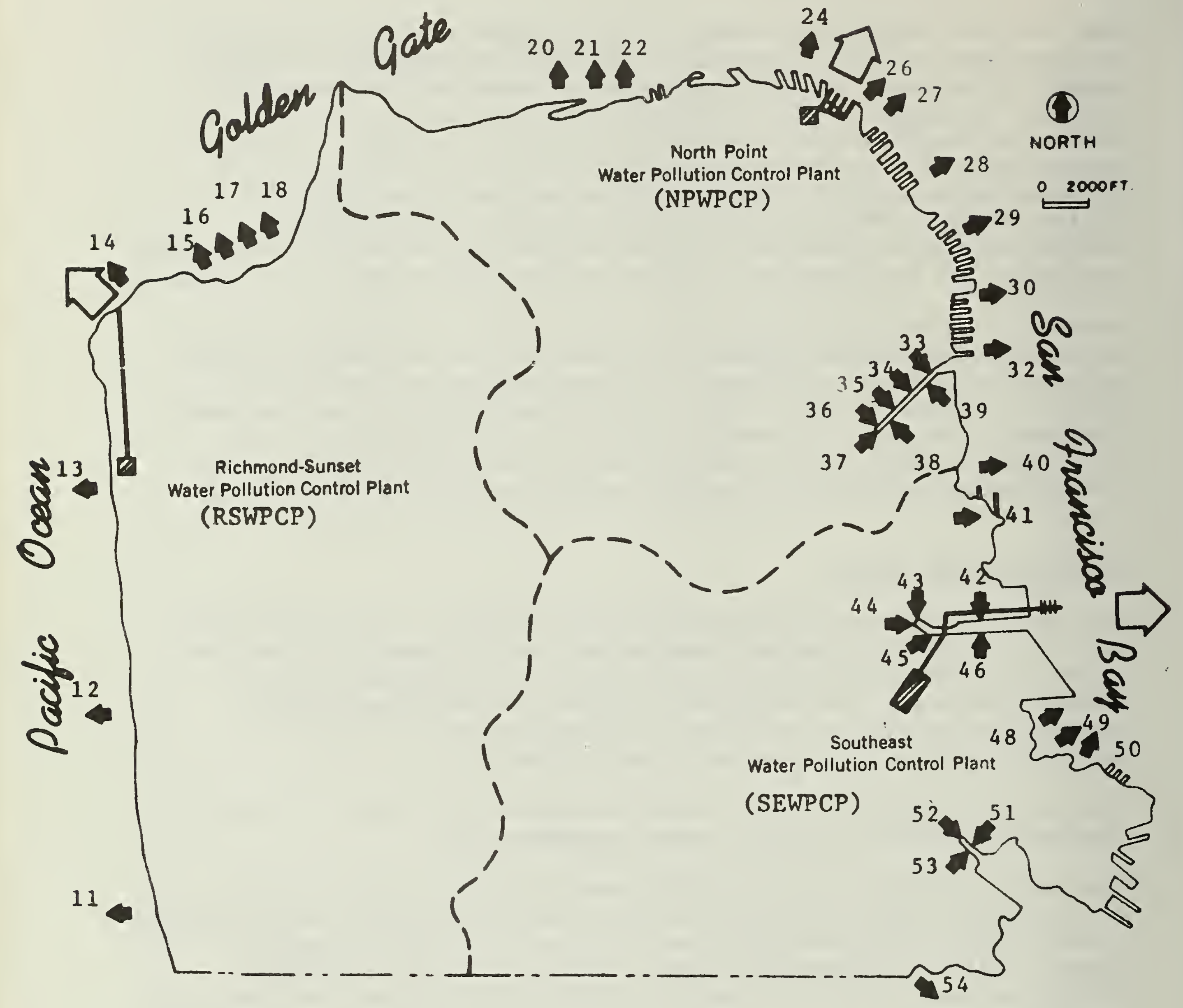
The existing combined sewerage system must transport, treat and dispose of both dry weather flows and combined wet weather flows. To function under the extreme ranges encountered under the dual regimen of wet weather conditions, the system was originally arranged and sized to accommodate the wet weather flow conditions primarily. Exhibit 3, opposite, shows a block diagram of the system.

The City is divided into three sewerage service areas, each of which is presently served by a primary sewage treatment plant.

The three plants are the North Point Water Pollution Control Plant, Richmond-Sunset Water Pollution Control Plant and Southeast Water Pollution Control Plant. The location of each of the plants and its outfall, together with the approximate area it serves, is shown on Exhibit 4. Within each service area of each plant are varied land uses and population densities.

EXHIBIT 4

TREATMENT PLANTS AND OUTFALL LOCATIONS



Golden Gate
20 21 22
24
26
27
North Point
Water Pollution Control Plant
(NPWPCP)
NORTH
0 2000 FT.
28
29
30
32
San Francisco Bay
33
34
35
36
39
37
38
40
41
14
15
16
17 18
13
Richmond-Sunset
Water Pollution Control Plant
(RSWPCP)
Pacific Ocean
12
11
43
42
44
45
46
48
49
50
Southeast
Water Pollution Control Plant
(SEWPCP)
52
51
53
54

Presently the City is divided into three drainage districts (indicated by the broken line) which follow the topographical features of the City. Each of the districts is served by a Water Pollutuon Contol Plant which provides primary treatment with chemical addition before discharge of the effluent through an outfall (represented by the large arrows). Located around the perimeter of the City are 39 bypass locations (represented by the solid arrows) where a combination of untreated domestic wastewater and stormwater overflow into the Bay and Ocean when rainfall exceeds 0.02 inches per hour. Overflows occur approximately 80 times per year.

Numbers adjacent to arrows represent the outfall system reference number which is keyed to Master Plan documents.

North Point Water Pollution Control Plant (NPWPCP)

The North Point Water Pollution Control Plant serves an area of 7,500 acres. The tributary area includes residential, commercial and industrial land use areas. The plant now provides a chemical primary treatment consisting of pre-chlorination, screening, grit removal, preparation and primary sedimentation with chemical coagulation using ferric chloride and postchlorination. Flows exceeding plant capacity are bypassed directly to San Francisco Bay without any treatment at 17 locations. The primary effluent does not meet the National Pollution Discharge Elimination System (NPDES) and Regional Water Quality Control Board (RWQCB) discharge requirements.

Project Drainage

The area built upon (including improved streets) is expected to increase from approximately 21,900 ft. to 429,000 ft. This would result in increase storm runoff from 21,000 ft.(1) Using the rational formula Q = CIA where:

I is the average rainfall intensity in inches per hour
A is the drainage area in acres.
Q is the rate of runoff expressed in cubic feet per second. (which is practically equivalent to acre-inches per hour)

Design calculations are based upon criteria furnished by the City of San Francisco and all are sized to carry the gravity flow produced by a storm having a 5-year recurrence interval, assuming a free outlet condition.

This would result in an increase storm runoff of approximately 258 cubic feet of water per day during the January peak wet period month, based on an intensity of 4.57 inches at the Federal Building weather gauge. Thus an increase of 0.002 million gallons per day (MGD) would result requiring treatment in the city combined system during peak periods at the North Point Water Pollution Control Plant.(2)

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(1) Environmental Impact Report - City Planning Commission, April 25, 1974, page 10

(2) Ibid pg. 11

The drainage water generated in this project area in general will be conveyed to existing 21-inch storm sewer in Sacramento Street. The sewer has a slope of approximately 18% and has sufficient capacity to handle generated flows.

Drainage and Flooding Impacts:

1) The amount of storm runoff from this site and the increment in the daily load due to the additional population will not result in a significant increase in demand on the combined sanitary and storm sewer system, but will have a slight adverse effect until the City improves its sewage handling system with implementation of the Wastwater Master Plan.

2) Due to slope of project area, minor construction problems may develop in controlling rainwater.

PART III

ALTERNATIVES TO THE PROPOSED ACTION

The proposed action is for HUD to approve the Project, which would result in assuring the Sponsor that HUD Section 236 rent subsidies would be available. The Project after construction would provide 140 housing units for low income elderly persons and 35 housing units for low income families. The commercial development is a portion of the Sponsor's project. The commercial parking garage is a separate financial operation.

1. No HUD Assistance - Market Rate Housing

An alternative is for HUD to reject the Project. This would eliminate the housing subsidies and the Project would not be feasible as proposed. The San Francisco Redevelopment Agency, as the owner of the land, would under existing procedures be required to seek alternative land disposition proposals. HUD is not considering other housing subsidy programs for this siteand, therefore, other housing proposals/for the site would be based on market interest rates.

The usual method of a redevelopment agency to consider non-subsidized housing is to advertise for development proposals from profit-motivated firms. The agency may or may not in its various selection criteria include a factor for housing density and building heights. However, due to the shortage of housing in San Francisco and developer incentives for maximizing development, it would appear reasonable to expect, as a maximum, the same level of development as the proposed Project.

With appropriate City approvals, market rate housing is a viable alternative to the Project. The market rate housing would be for upper middle income individuals and families to reflect market costs of construction and rental/sale housing. Based on the low vacancy rate of housing in San Francisco, there is a strong market for this priced housing.

This alternative would not reduce or eliminate the adverse environmental impacts. The noise and air pollution impaction on the site from Sacramento and Stockton Streets would remain the same or increase since upper middle income persons would use automobiles more frequently than elderly persons or low income families.

The blocking of views and the casting of shadows on nearby properties would likely remain unchanged or possibly increase depending on whether the development was greater than the size of the proposed Project. Construction costs to shift the high rise tower to the corner of Sacramento and Stockton Streets are estimated to be substantial and profit-motivated developers would also be guided by such additional costs.

HUD's original approval of the Neighborhood Development Program for this housing Project was to assist in alleviating the critical housing shortage in the area for low income elderly and low income families. This critical shortage in low income housing continues. The alternative Project for market rate housing does not appear to be the solution to the serving of low income individuals and families and does not mitigate against adverse environmental factors. Accordingly, HUD considers this market rate housing alternative to be a less desirable development.

2. No HUD Assistance - Commercial/Hotel Development

Another alternative to the proposed Project is for the San Francisco Redevelopment Agency to sell the site for commercial and/or hotel development.

This alternative would involve the maximizing of development on the site. Less than full potential development would be economically unrealistic because of the site location and potential uses of the site. Full development of the site for a commercial/hotel complex would utilize the site at least to the same extent as the proposed Project.

Development of the site for commercial/hotel uses would not reduce any of the anticipated adverse environmental factors of the Project. The air and noise intrusion from Sacramento and Stockton Streets will be at the same level of increased due to additional traffic originating from commercial/hotel uses from the proposed Project. The blocking of views and the casting of shadows will remain the same or increase those expected from the proposed Project. Higher or bulkier construction would cause such increases. In the event that the high rise tower is shifted to the corner of Sacramento and Stockton Street, as a commercial/ hotel venture, substantially greater height and bulk would be necessary to gain additional revenues to pay for the higher costs necessitated by the shift. In addition, more garage space would be required under San Francisco requirements for the commercial/hotel development than for the elderly and family residential uses.

The alternative development of the site for commercial/hotel construction does not appear to be an advantageous choice over the proposed Project. None of the anticipated adverse environmental factors would be mitigated and, there is a good likelihood that they would be aggravated. The purpose of the Project to provide low income housing for elderly and families would not be served. Even if there were a shortage of commercial/hotel space, in San Francisco it would be more appropriate to alleviate the shortage of housing than the shortage of commercial/hotel space.

3. No HUD Assistance - Open Space/Park

One alternative to the proposed Project is for the San Francisco Redevelopment Agency to sell/transfer the site to the City for the creation of an open space area or park development. It is expected that San Francisco would have to seek a ballot approval for the issuance of park bonds for the acquisition and development of open space or a park.

The open space/park alternative is an attractive feature in almost any location and would enhance values in the immediate vicinity. The site itself, however, does not lend itself topographically to an open space/park area. Extensive grading and the construction of retaining walls and terracing would be necessary to level the land for pedestrian and children's play areas.

An open space/park development would be subjected to the same air and noise impactions from traffic on Sacramento and Stockton Streets. These adverse environmental factors could be mitigated by the construction of masonry walls circumscribing the site. Such a wall, however, would effectively eliminate the major amenities of open space/park activities.

The alternative of open space/park does not meet the needs for housing of low income elderly persons and families in the area. Portsmouth Square Park is a block and a half away and substantially serves the area. HUD feels that the need for low income housing reflects a significant hardship on potential persons to be served by the Project. In this choice of alternatives, the priority is to meet, to the extent proposed, the need for low income housing.

4. Alternative Locations

Other site locations for the Project are possible alternatives to the proposed Project. Other site alternatives may also provide additional housing for low income elderly and families. Another site now under development for low income families is in the Hunters Point area. HUD recently considered and approved approximately 600 units of subsidized housing in that area for low income families. Housing for low income families has been considered by the Recevelopment Agency in Yerb Buena Project.

Because there exists a lack of available sites in the vicinity of the proposed Project, it is impossible to identify specific alternative site locations. At this time, HUD is not aware of any sites within a mile or more of the proposed Project (other than redevelopment areas--because such areas have already publicly been considered for housing for low income persons) that is available for the development of housing for low income families and/or individuals. HUD would be interested in the consideration of additional housing for low income persons if alternative site locations in the area become available. The reason is that the housing shortage for these low income persons is critical and if sites become available, they will be considered as additional sites for such housing in addition to the proposed Project.

A Major factor in alternative site availability is that the subject site is owned by the San Francisco Redevelopment Agency. That Agency, following public notice and public hearings, determined that it was in the public interest to acquire the subject site and prepare it for the construction of low income elderly and families. The San Francisco Board of Supervisors concurred. Alternative sites would have to undergo similar public acquisition to bring the costs down within the statutory cost limitations of the proposed Project. At this time, there are no intentions by the San Francisco Redevelopment Agency to acquire additional sites for these purposes.

5. Site and/or Design Modification

During the design preparation of the proposed Project, a variety of different configurations on the site were considered by the sponsor and HUD. These variations included siting the structures on different site locations, altering height and building bulk and other more detailed architectural changes. These variations were reviewed by HUD technical staff.

The resulting Project design by the sponsors has received initial, though not final, HUD approval. No design will receive final approval by HUD until after proper completion of the environmental process and construction drawing approvals.

A proposal has been suggested to HUD to shift the location of the 13 story residential tower from its proposed location to the corner of Sacramento and Stockton Streets. HUD has reviewed this concept to ascertain if the suggestion is economically feasible and how the suggestion would affect the views of the Bay from nearby residential developments.

HUD finds that the suggested modification would cost about $300,000 more than existing cost estimates for the proposed Project. HUD also finds that certain views towards the Bay will be substantially blocked and others will be partially blocked which would be made necessary by changing the tower location. Details of these two analysis are in the following Sections on Architectural Aesthetics and Cost Analysis.

The additional cost of some $300,000 is required to provide a ductile frame which would be made necessary by changing the tower location. This is an added cost of $1,700 per residential unit proposed. An estimated 19 dwelling units behind the proposed housing tower will be affected. The cost to shift the tower would be over $15,000 per view-affected unit. The extra cost of such a move would be passed on to the tenants, who would then have to receive additional HUD subsidy payments to amortize the cost of the tower move.

HUD regrets that the views of about 19 residential units will be restricted to some extent by the proposed Project. However, the present proposal with the tower at the top of the site does emphasize its hillside nature and is consistent with the principles of the City's Urban Design Plan. Moving the tower would also block the views of other neighbors on California Street. This the alternative would cost more and be aesthetically less pleasing merely to shift view blockages from one group to another.

Another major consideration is the urgent need for low income housing for elderly and family units in the area. This need is especially critical for such low income persons because there are almost no alternatives for such persons, other than established public housing developments. Moreover, the waiting list for these public housing units is long and significant hardship falls on those elderly and families who are in urgent need of decent, safe and sanitary housing within their financial means.

After consideration of the cost factors for shifting the tower over the proposed Project garage and the other factors noted, HUD believes the proposed Project design is appropriate and preferable over the suggested change.

ARCHITECTURAL AESTHETICS

In the course of the preparation of the Draft Environmental Impact Statement on Mei Lun Yuen, the 840 Powell Street Homeowner's Association submitted an alternative proposal together with other points which they requested HUD consider in the course of its study. (See following two pages). This assessment, together with the following one on Cost Analysis are primarily concerned with this alternative proposal although the shadow studies and some other aspects include the main proposal.

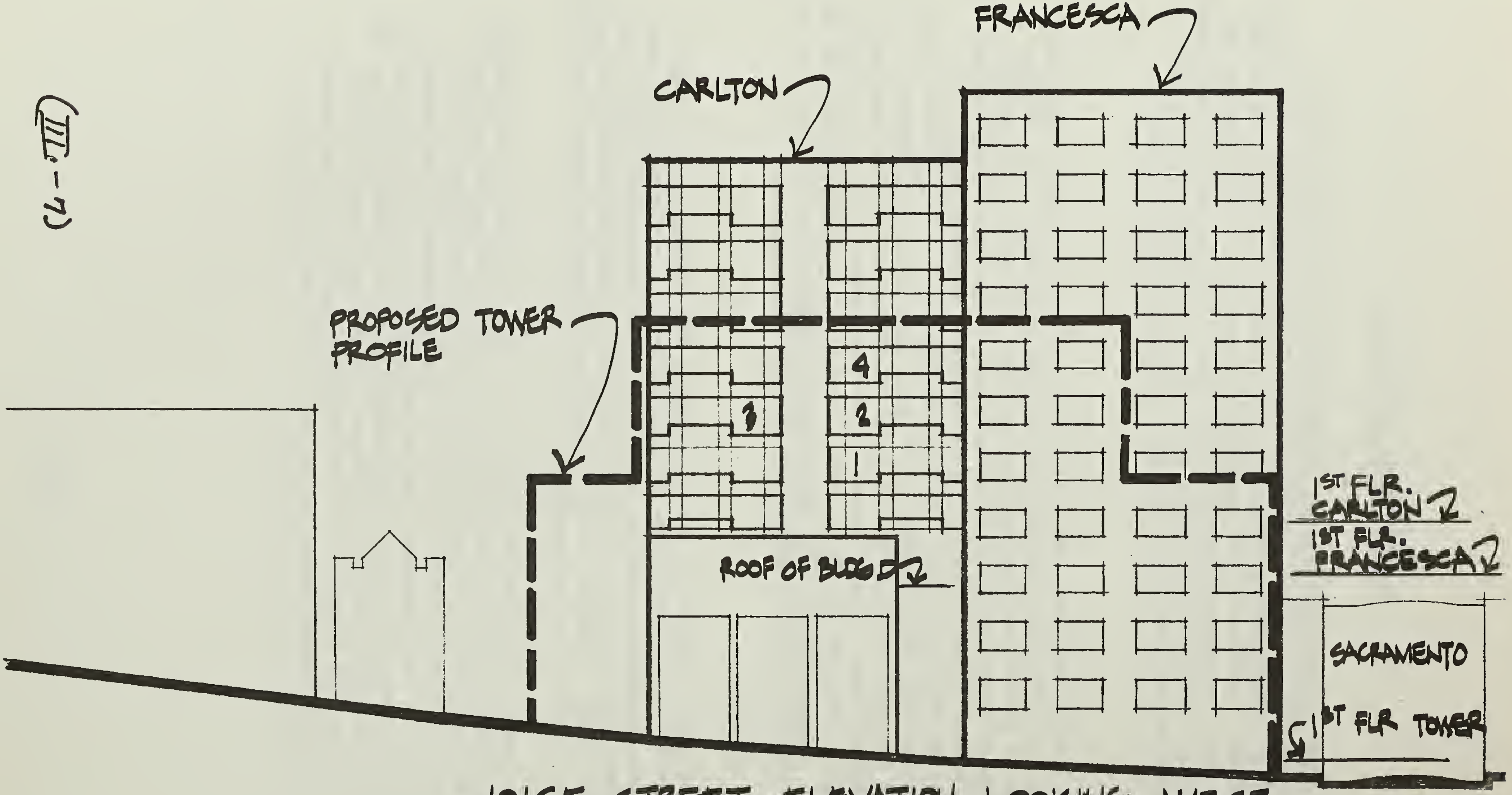
DESIGN

The site itself suggests that the building heights should be graduated up from a low point at Stockton and Sacramento Streets. For example, the tower is placed towards the crown of the hill while the smaller scaled family units are placed at the slope of the hill. The elevations from Sacramento Street provide visual interest and enrichment. The image will be white in color, Mediteranean-like, with bay windows which is consistent with the historic scale and texture of San Francisco. The buildings maintain an appropriate level of light and air for residents and for pedestrians. (Even though the Redevelopment Plan is controlling, the design of the Mei Lun Yuen tries to adhere in every relevant way to the Urban Design Plan For The Comprehensive Plan of San Francisco as set forth by the San Franciso Department of City Planning).

Financial Feasibility

One of the points raised by the Homeowner's Association of 840 Powell Street involved the possibility of eliminating the commercial and commercial parking garage uses on the subject site which would then allow the proposed housing and residential parking facilities to be constructed on a lower scale. However, such a change would have an adverse financial impact on the financing of the entire Urban Renewal Project.

The development of the Mei Lun Yuen Project will be accomplished under the Urban Renewal regulations of Title I of the Housing Act of 1949, as amended and Section 236 of the Housing and Urban Development Act of 1968. Under the provisions of the Stockton-Sacramento Urban Renewal Plan the anticipated proceeds from the sale of the land for Section 236 residential, commercial and parking garage uses is somewhere around the Fair Market Value of $567,000. However, if the land were sold for Section 236 housing only, Title I of the 1949 Housing Act as amended permits the Fair Market Value to be set at $500 per dwelling unit or $87,500. ($500 x 175 units = $87,500).


FRANCESCA
CARLTON
PROPOSED TOWER PROFILE
4
3
2
1
ROOF OF BLDG
1ST FLR. CARLTON
1ST FLR. FRANCESCA
SACRAMENTO
1ST FLR TOWER

JOICE STREET ELEVATION LOOKING WEST

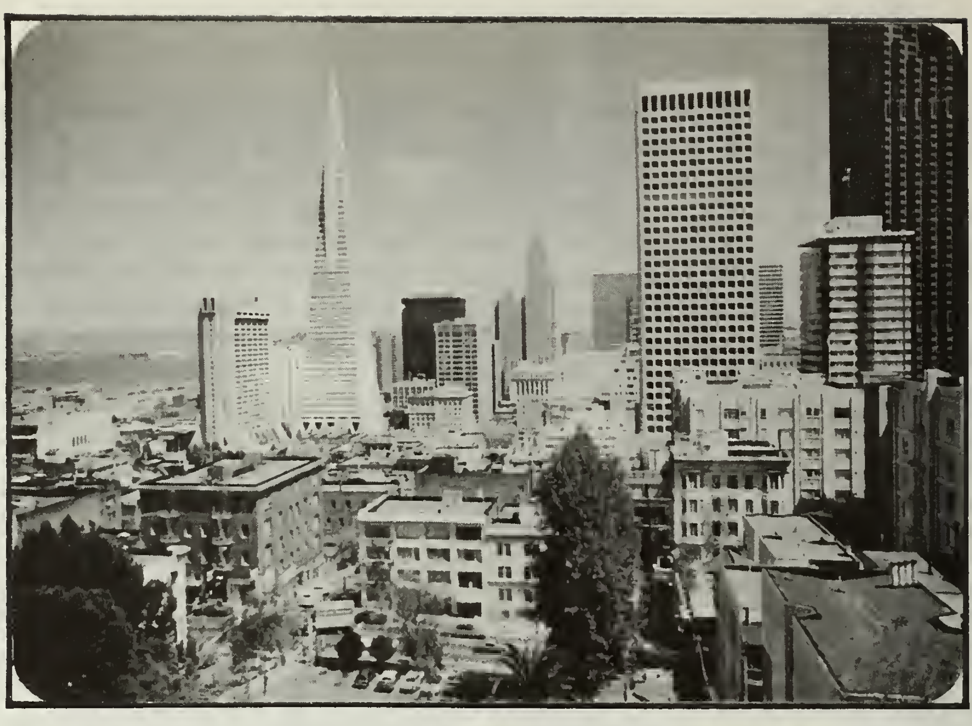
1" = 30'-0"

This is a Loan and Grant Urban Renewal Project, and the federal loan must be paid off with grants and proceeds from the sale of the land. Since the anticipated land sale proceeds under the multi-use design of the Urban Renewal Plan are some $567,000, changing the Urban Renewal Plan to permit only Section 236 housing would leave a net deficit of some $479,500. The Federal Government (HUD) does not have any additional urban renewal grants to give to the San Francisco Redevelopment Agency to assist it in making up this deficit. Hence, it would have to be repaid by the San Francisco Redevelopment Agency or the City of San Francisco from local sources.

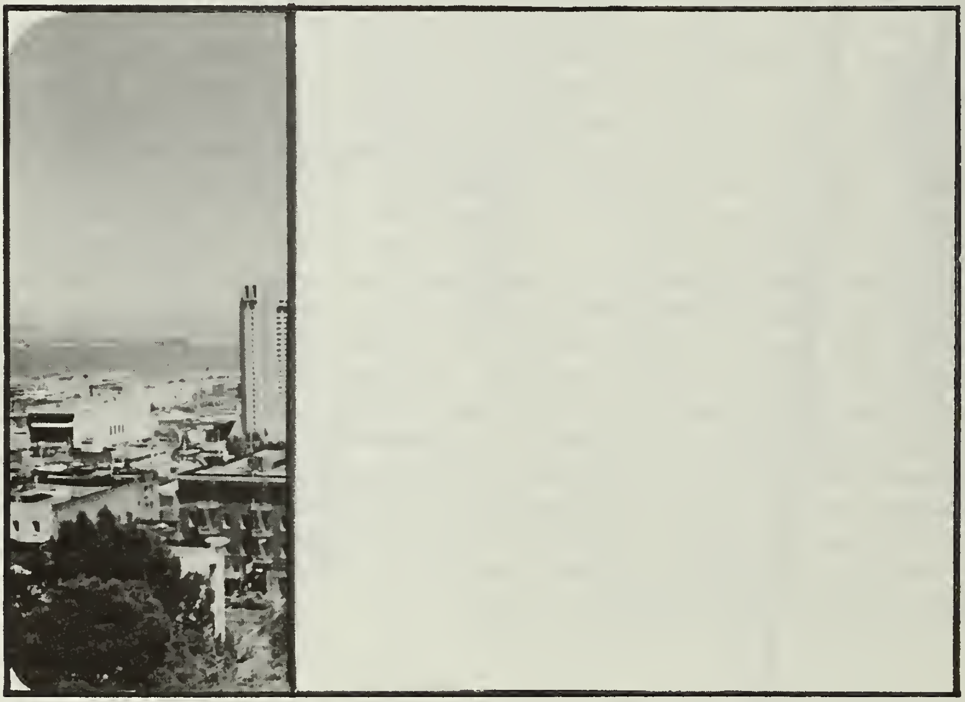
In setting up the original Urban Renewal Plan which still governs this Project, the multi-use concept was adopted to insure the financial feasibility of its implementation.

VIEW STUDIES

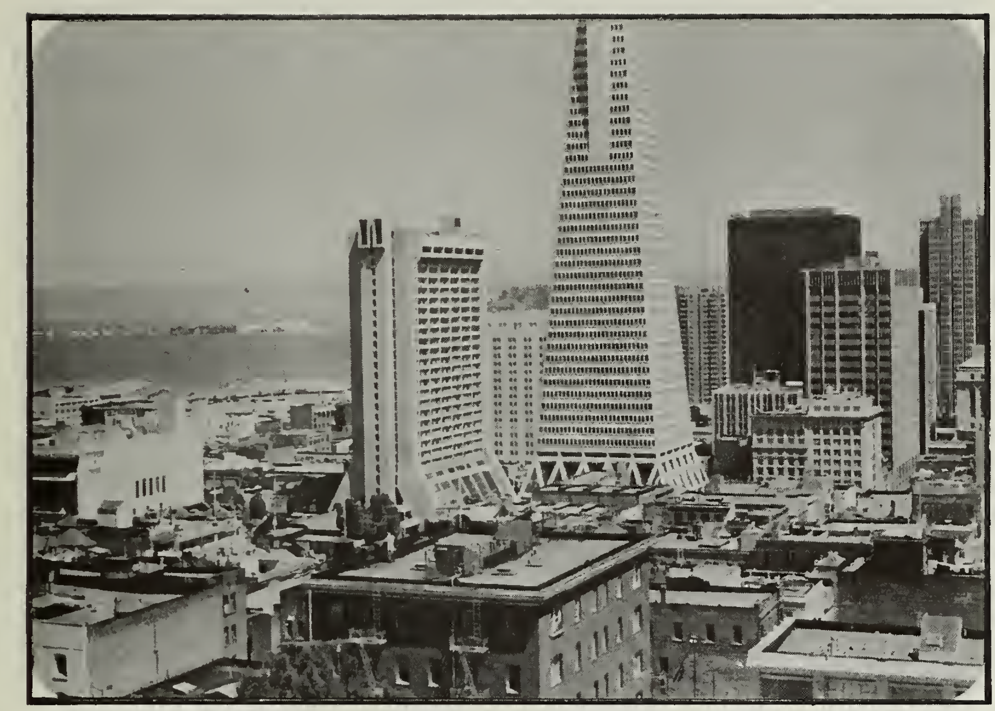
The most controversial issue raised about this project is the blockage of views of the San Francisco Bay by the Homeowners Association of 840 Powell Street, a high-rise apartment building west of the project site. The blocking of views by the proposed design has been carefully studied by Architects Associated and by HUD. Photographs were taken from units on all of the affected floors of 840 Powell Street. It has been determined as much as possible where the proposed tower might impinge upon critical views. The tower design takes these concerns into consideration by stepping down at both ends leaving open the best views of the Bay for most of the units. (See Joice Street elevation, opposite.) The tower location and configuration have been adjusted to grant the tenants of 840 and 850 Powell Street clear and relatively unhampered views of the San Francisco Bay. While taking photographs from 840 Powell, Architects Associated and HUD were able to view the proposed site and project the imaginary lines of the proposed building. The photographs shown on the next pages were taken by HUD staff and indicate the views as shown by Architects Associated before and after the tower. The view study (page III-13) shows the project with its high-rise tower, the two affected high-rise buildings behind it, and indicates major landmarks. Major towers in the line of sight are shown: One Embarcadero Center, The Transamerica Building, 300 Broadway, Holiday Inn, and the Empress of China (China Trade Center). The long triangular shape indicates the major preferred view of the Bay as expressed to Architects Associated by the tenants at 840 and 850 Powell Streets and as expressed to the HUD representative by the tenants at 840 Powell Street. The photographs show the present views of the Bay from 840 Powell Street. The portions to be obscured by the proposed tower are eliminated in the lower photograph by that portion describing the view.



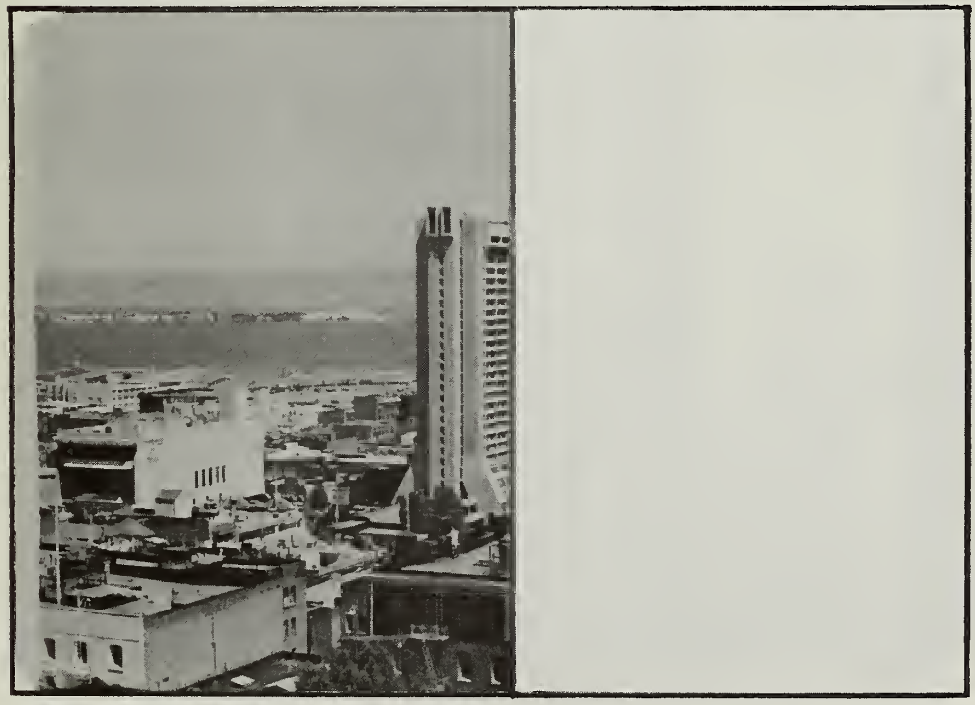
ORIGINAL VIEW OF BAY
BEFORE TOWER FROM UNIT #1 (201)



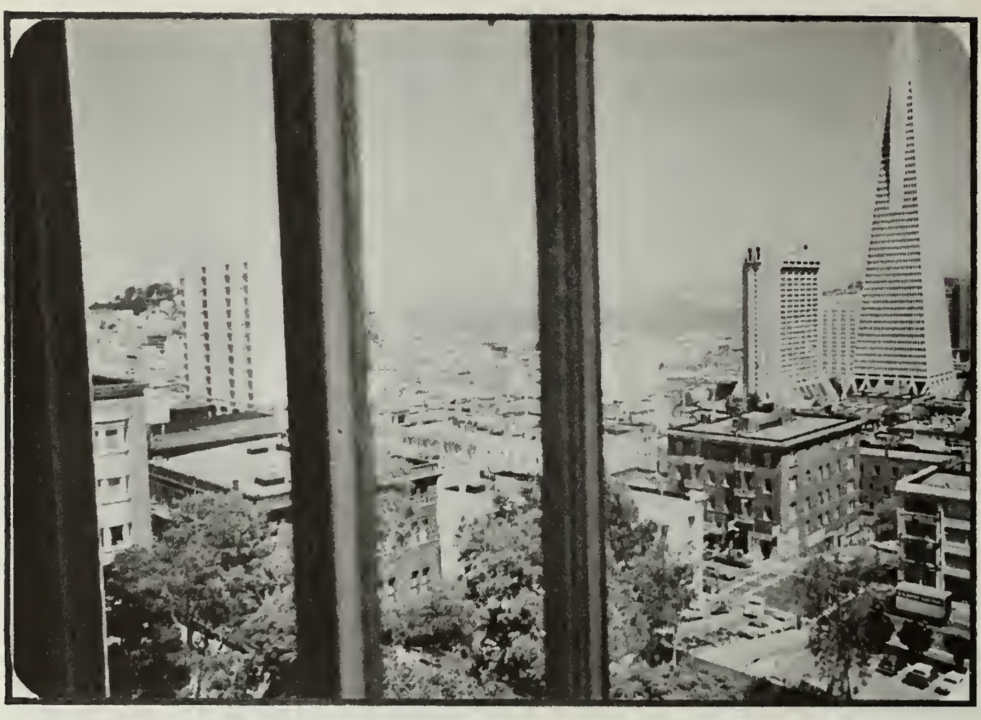
VIEW AFTER TOWER OF BAY



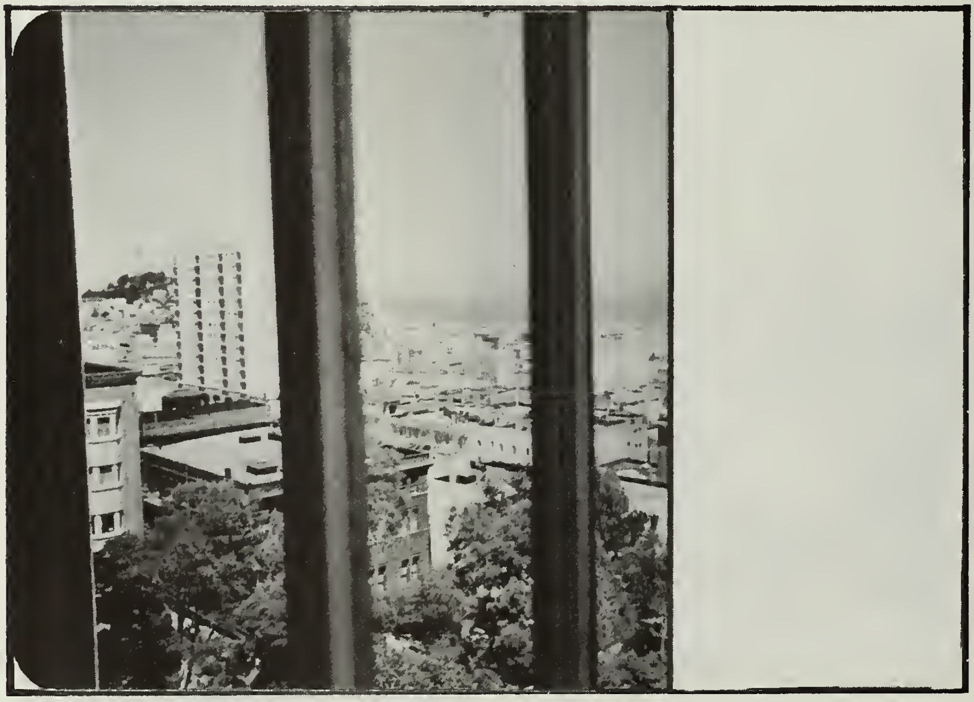
ORIGINAL VIEW OF BAY
BEFORE TOWER FROM UNIT #2 (301)



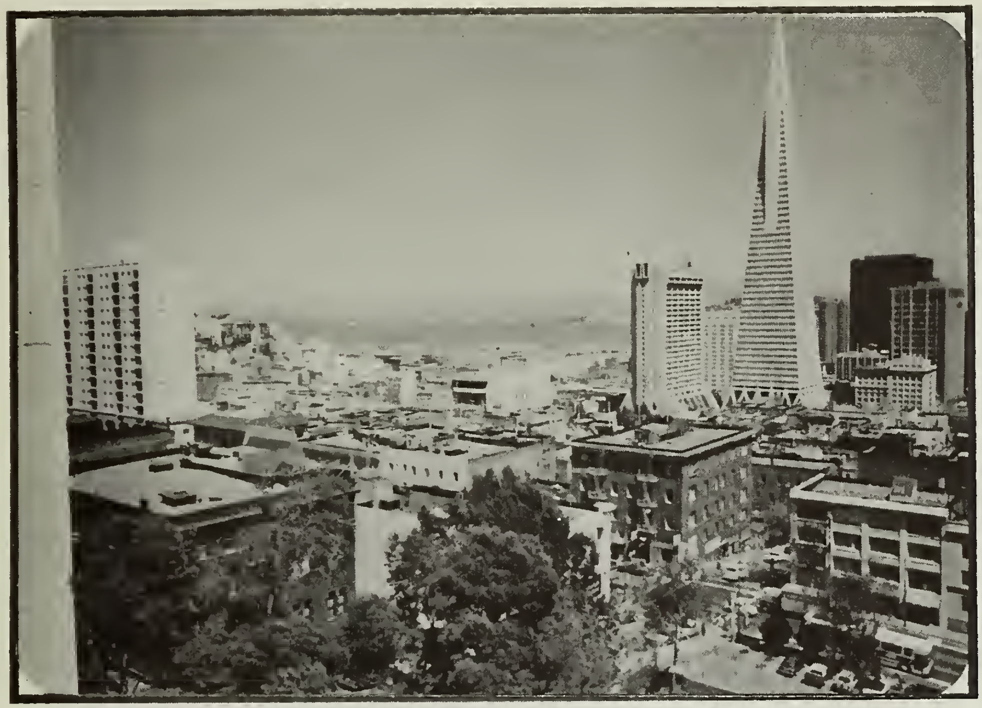
VIEW OF BAY AFTER TOWER



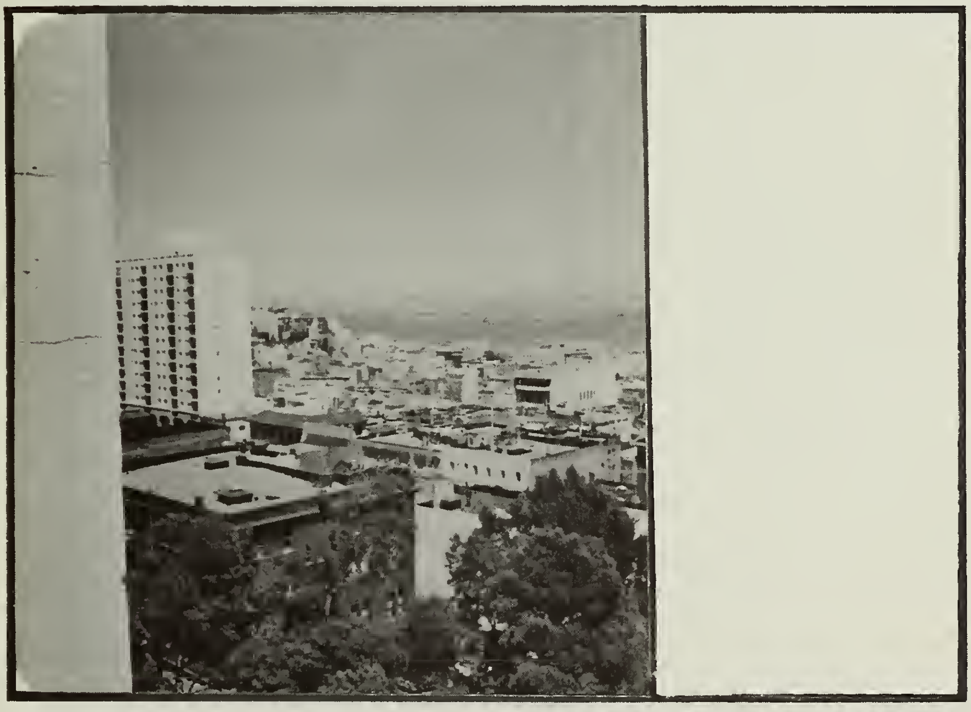
ORIGINAL VIEW OF BAY
BEFORE TOWER FROM UNIT #3 (302)



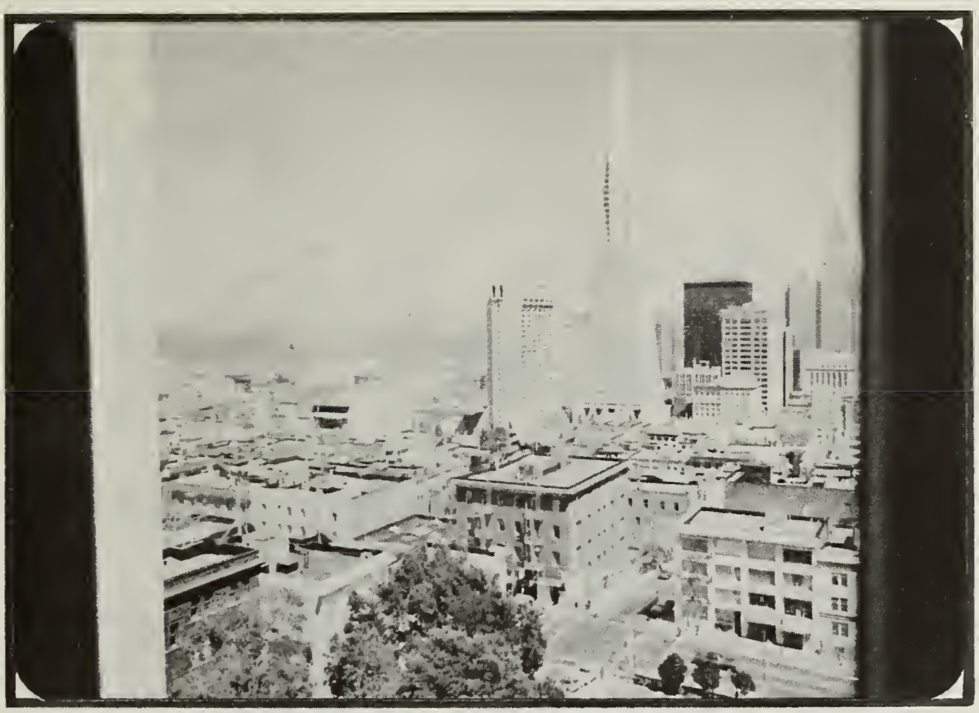
VIEW OF BAY AFTER TOWER



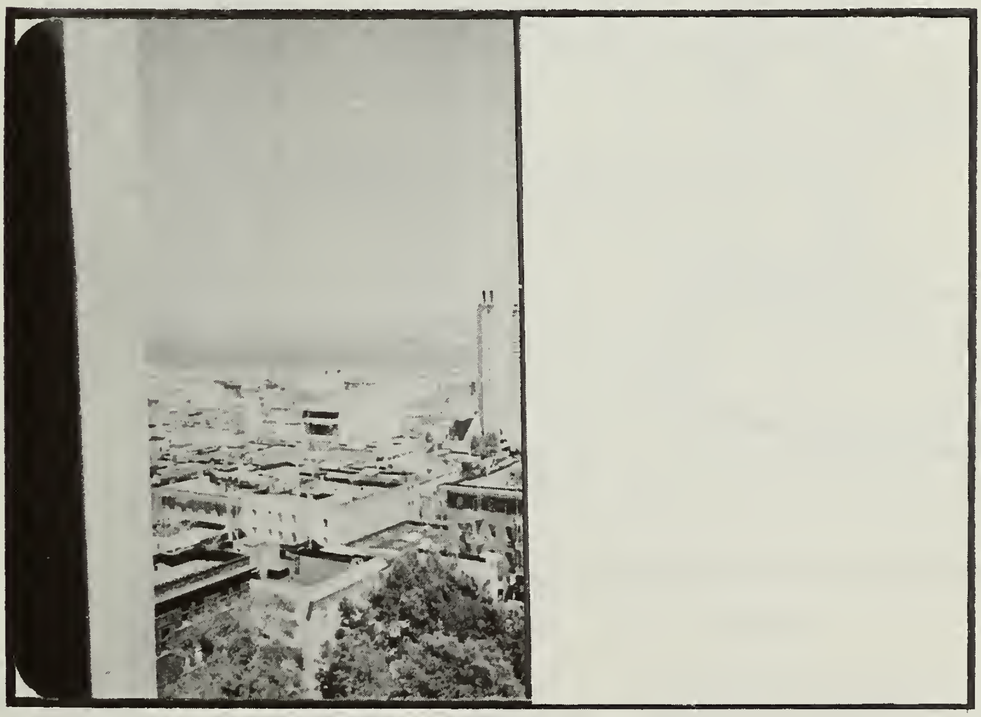
ORIGINAL VIEW OF BAY
BEFORE TOWER FROM UNIT #3 (302)



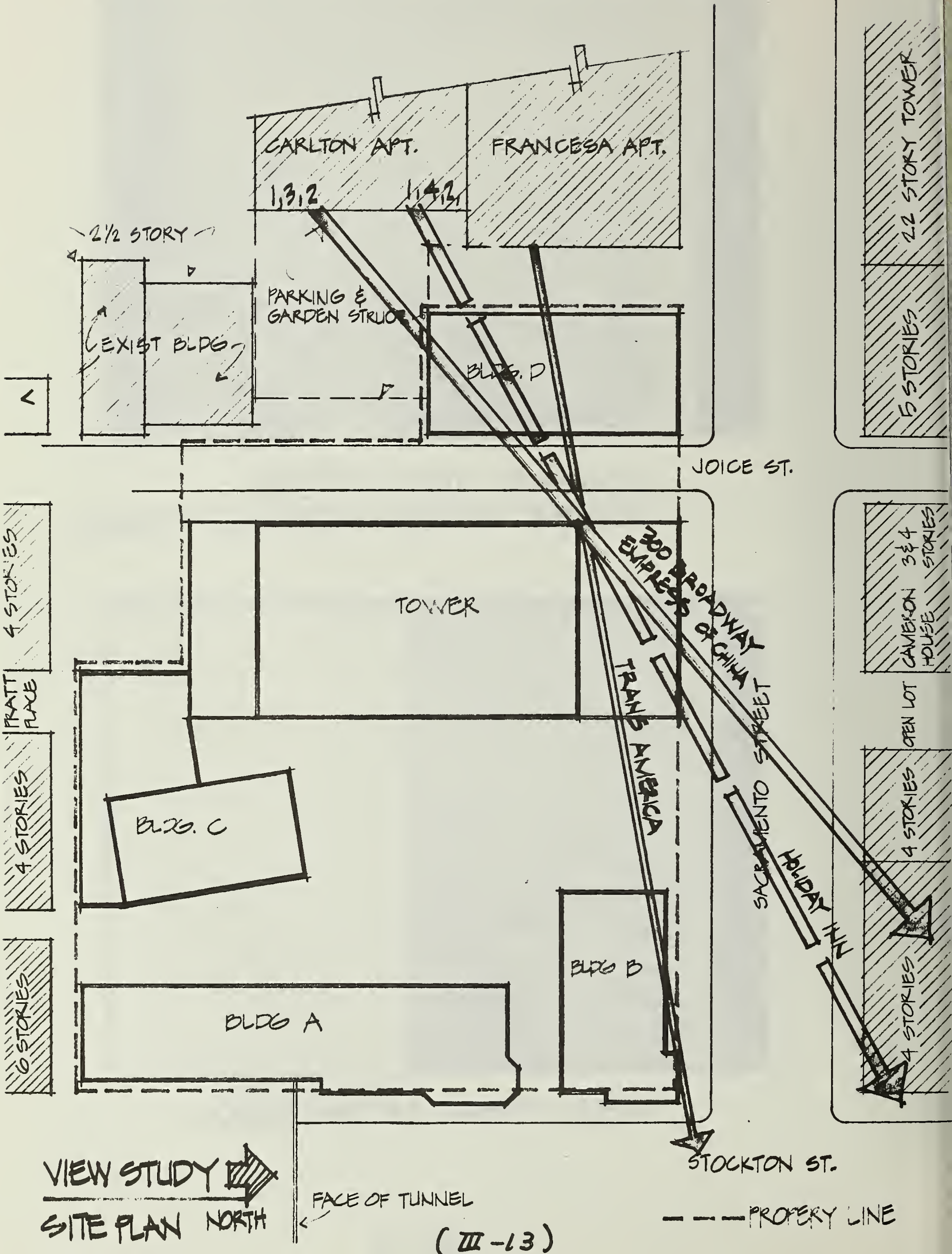
VIEW OF BAY AFTER TOWER



ORIGINAL VIEW OF BAY
BEFORE TOWER FROM UNIT #4(401)

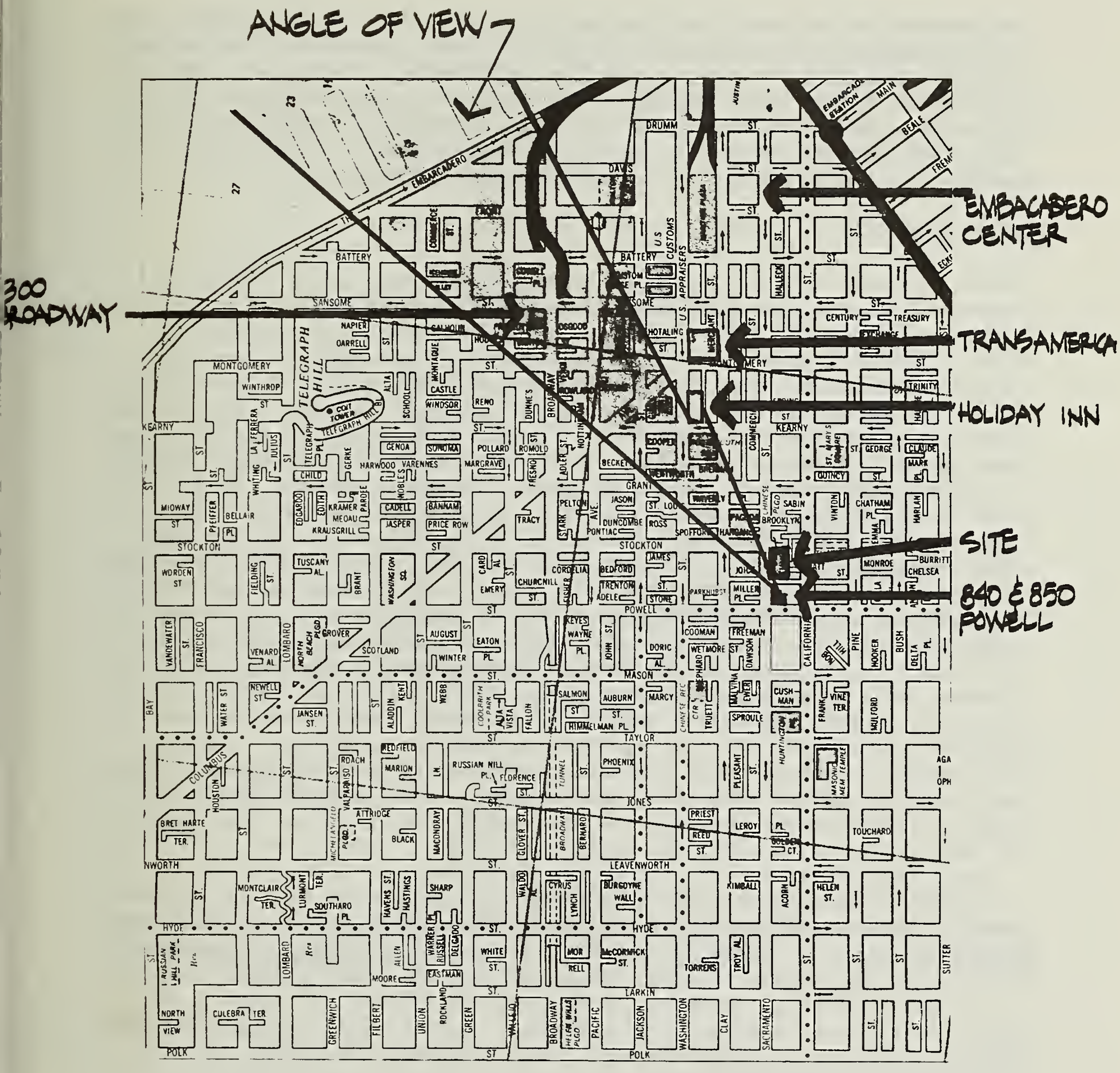


VIEW OF BAY AFTER TOWER



VIEW STUDY
SITE PLAN NORTH

CARLTON APT.
FRANCESA APT.
1,3,2
1,4,2
22 STORY TOWER
5 STORIES
2½ STORY
EXIST BLDG.
PARKING & GARDEN STRUC.
BLDG. D
JOICE ST.
4 STORIES
PRATT PLACE
4 STORIES
6 STORIES
TOWER
300 BROADWAY
EMPRESS OF CHINA
TRANS AMERICA
SACRAMENTO STREET
HOLIDAY INN
3 & 4 STORIES
CAMERON HOUSE
OPEN LOT
4 STORIES
4 STORIES
BLDG. C
BLDG B
BLDG A
STOCKTON ST.
FACE OF TUNNEL
PROPERY LINE


ANGLE OF VIEW
EMBACADERO CENTER
300 ROADWAY
TRANSAMERICA
HOLIDAY INN
SITE
840 & 850 POWELL
EMBARCADERO
BATTERY
SANSOME
MONTGOMERY
KEARNY
GRANT
STOCKTON
POWELL
MASON
TAYLOR
JONES
LEAVENWORTH
HYDE
LARKIN
POLK
TELEGRAPH HILL
COIT TOWER
COLUMBUS
BAY
FRANCISCO
LOMBARD
GREENWICH
FILBERT
UNION
GREEN
VALLEJO
BROADWAY
PACIFIC
JACKSON
WASHINGTON
CLAY
SACRAMENTO
CALIFORNIA
PINE
BUSH
SUTTER
DRUMM
DAVIS
FRONT
U.S. CUSTOMS
U.S. APPRAISERS
MERCHANT
COMMERCIAL
HALLECK
EMBARCADERO STATION
MAIN
BEALE
RUSSIAN HILL PARK
NORTH VIEW

VIEW STUDY

NORTH

The numbers on the site plan, see page opposite III-13 the elevation and the photographs all key together to give a clear picture of the situation in all of the affected units at 840 Powell Street. Blockage is minimal since the building is at a higher elevation than the proposed tower and is located one-half of a city block away. 840 Powell Street is approximately 100 feet away from the tower; note that there is a 22-story apartment building only 49 feet away from 850 Powell Street.

SHADOW PATTERNS

Shadow patterns have been studied by Architects Associated for every season and time of day for the project and its surroundings. Architects Associated have projected shadows for the summer solstice (June 21), spring equinox (March 21), and autumn equinox (September 23) at 1:00, 2:00, and 3:00 p.m. These studies (located at the end of this chapter) show that the open areas receive adequate sunlight through 2:00 p.m. in mid-winter; the open areas will be in shadow during the afternoon. The first series of shadow patterns show the site before development (pages A, B and C). The second series of shadow patterns show the project tower at different locations on the site (pages D, E, F and G). These studies were used to determine the best location for the outdoor open area. Although pages D and E indicate that there are large sunny areas, the tower is at the slope of the hill which is not consistent with the urban design plan of San Francisco. Page G indicates that the tower placed at the crown of the hill will allow a large sunny area from 10 a.m. until 2 p.m. (page N) and this is during the autuminal solstice. It would be greater during the summer solstice (page M). The third series of studies (pages H, I, J, K, L, M and N) show the tower at different locations, but also include the smaller buildings. Pages M and N clearly indicate that the scheme shown will have a sunnier outdoor area more of the time than any other scheme. This proposal has the tower at the crown of the hill and the smaller buildings at the slope of the hill.

The shadow studies were verified by HUD staff and found to be true and correct. The method used to verify the shadow studies was the sun path diagram as shown on pages 70 and 71 of Architectural Graphic Standards, 6th edition, by Ramsey/Sleeper, published by John Wiley & Sons, Inc., N. Y. If the Project is approved, Architects Associated will hire a wind expert consultant to study wind patterns. A model will be built to conduct wind tunnel studies as well as to further study shadow patterns and demonstrate view blockage.

CODE VIOLATIONS

Two letters from the Department of Public Works granted variances to Architects Associated. The first letter, dated August 26, 1974, states: "It has been noted that Building D is a four-story building of type 5-one hour construction with type 1 construction on the first floor containing the B3 occupancy. Pursuant to the applicable provisions of Section 507, this bureau hereby approves the location of B3 occupancy on the ground floor of Building D provided the following conditions are complied with:

1. A supervised automatic sprinkler system shall be provided throughout the entire building.
2. The main entry to Building D shall be arranged to front Sacramento Street.
3. Allowable floor areas shall conform to the provisions of Section 505-A."

The second letter, dated July 24, 1975, states: "It has been noted that Building "C" is a five-story building of type 3, 1-hour construction with type 1 construction for the B3 occupancy on the ground floor. Pursuant to the provisions of Table Nos. 5-D and 5-E and Section 507 of San Francisco Building Code, this bureau hereby permits the location of a group B3 occupancy on the ground floor of Building "C" provided the entire building is equipped with an approved supervised automatic sprinkler system and provided a fire department apparatus access to the building approved by the San Francisco Fire Department is provided and a copy of the recordation of the San Francisco Fire Department access road is attached to the building permit application."

The variances were signed by Alfred Goldberg, Superintendent, Bureau of Building Inspection.

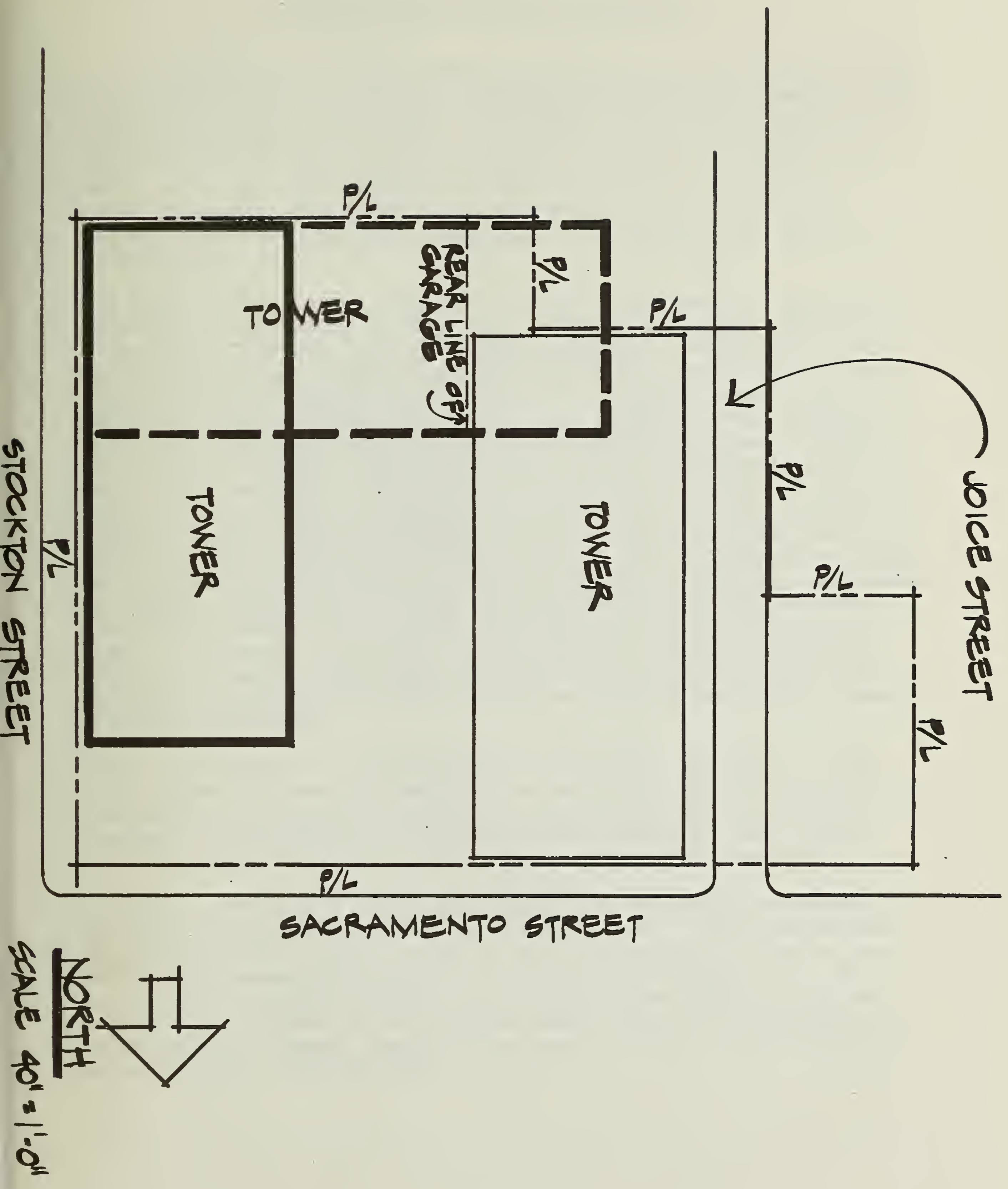
The project, as proposed, does not violate the building and fire code as per Article 5, Table 5-A, page 119 of the San Francisco Building Code. This was verified by Mr. Alec Corenevsky, Senior Plan Checker of the Department of Public Works. The windows can be operable and the building will have a sprinkler system. For fire truck egress, see Public Services, Part II of this report.

PREFERRED VIEW

The major preferred view expressed by the tenants to HUD staff and Architects Associated while in the field was of the Bay. According to Architects Associated that view will be preserved.

CONCLUSION

In reviewing the design by Architects Associated, the HUD critique and alternate solution, the point by point response by Architects Associated, and the proposal by the 840 Powell Street Homeowners' Association, it would appear that the current solution is responsive to the questions raised by this complex architectural and environmental problem. The current project design answers all of the objections so far raised. It will continue to be refined as the working drawings develop.


P/L
TOWER
REAR LINE OF GARAGE
P/L
P/L
TOWER
TOWER
P/L
P/L
P/L
P/L
P/L
STOCKTON STREET
JOICE STREET
SACRAMENTO STREET
NORTH
SCALE 40" = 1'-0"

COST ANALYSIS OF PROPOSED ALTERNATIVE

This discussion is concerned primarily with the probable additional cost of the engineering requirements involved in relocating the tower building to the east side of the property at Sacramento and Stockton Streets as proposed by the 840 Powell Street Homeowners Association. Since there was no specific drawn relocation proposal to analyze (the proposal is contained in the first paragraph of the letter from the 840 Powell Street Homeowners Association), HUD extrapolated from several basic assumptions which seemed most appropriate to accomplish the proposed alternative.

For example, the proposed tower is 64' x 160'. Reference to the sketch, opposite, indicates that if the long axis of the building is turned in on east/west direction from its present north/south configuration, the building would have to be moved in from the south property line at least 37' 6" or the 160' dimension would have to be reduced. (See dotted outline) If the building axis remains as at present but the structure is shifted to the southeast corner of the property (see heavy outline on sketch) the two parking levels behind the lobby would probably have to be relocated because of access problems from the upper level of Stockton Street. If the building is shifted to this corner and it is possible to eliminate and/or reduce the parking area floor heights so that the total height of the garage and tower does not exceed 160' it might be possible to design the structure without complying with the structural requirements of a ductile frame. the San Francisco Building Code stipulates that if a building is over 160' in height, it must be designed with a ductile frame. In essence, this type of frame requires considerable additional reinforcing steel in the columns and where the columns and slabs come together. In addition it is more expensive to place the various elements of the building itself.

Since, as discussed in the Architectural Aesthetics Section, inclusion of the commercial garage structure is necessary for the project's financial feasibility, that part of the design cannot be eliminated. Building of the tower over the garage is assumed to make a ductile frame necessary because of the combined structural height of the garage and tower.

In order to arrive at a total cost estimate in the absence of working drawings, several basic assumptions have been made. It is assumed that shifting the tower could be accomplished, that it would be located over the proposed commercial garage, that it would retain some of its own garage area, but that the balance of the garage area would have to be accommodated elsewhere on the site and that it would not be possible to limit the more stringent design to the tower and that portion of the garage directly under the tower.

Consultation with a HUD Structural Engineer obtained the opinion that having to use the ductile frame design in lieu of shear walls would add about 20% to the cost of the frame. Even though the extra cost would be limited to the reinforced concrete frame (because heating, cabinets, etc. would not be involved) an addition of 20% to that component alone would be a considerable sum.

HUD then decided to consult with people outside HUD who might have knowledge pertinent to this subject. The first was a structural engineer of a firm in Sacramento who has built many reinforced concrete high-rise structure here and in Los Angeles using the Dillon pre-fab system as well as conventionally designed structures not related to HUD programs. He agreed that use of the ductile frame could cost as much as 20% more. Several others were contacted, one of whom was a structural engineer of a firm who had had the occasion to make a comparison of this sort about a year ago. He stated that at that time their study indicated a ductile frame would cost $1.120/sq. ft. more. He was then asked if it would be possible to limit the more expensive ductile design to the tower and the portion of the parking garage directly below. His response was that it probably would be possible to design the tower support structure separate from the rest of the garage, but he thought any savings in construction would be reduced because of the need for extra columns in the separate garage as well as extra cost for some sort of slip-joint where the two structures met. Additionally, there would be continuing maintenance cost through the years. He doubted that the City and County of San Francisco would agree to such a design, but rather would insist the whole building be designed as a ductile frame.

On the basis of the above data, the more modest figure of $1.20/sq. ft. determined in 1975 has been escalated by 12% (July 1975 to July 1977) - a conservative rate considering the material and labor increases being experienced. This comes to $1.35/sq. ft.

Calculations are as follows:

Gross area of the tower 134,101 sq. ft. x $1.35	=	$167,536,
	say	165,000
Garage area below tower 41,000 sq. ft. x $1.35	=	55,350
Balance garage/commercial area 59,680 square feet x $1.35	=	80,568
		$135,918,
	say	135,000
TOTAL		$300,000

It should be noted the higher rate of 20% was not used nor were any additional costs assumed for accommodating the balance of required tower parking elsewhere on the site.

The ramification of such additional costs are presented on page III-4 under 5., Site and/or Design Modification.

PROJECTED SHADOW PATTERNS

PROJECTED SHADOW PATTERNS

Site Prior to Development

A	Vernal Equinox	Mar. 22 and September 23	3 P.M.
B	Vernal Equinox	Mar. 22 and September 23	4 P.M.
C	Winter Solstice	Dec. 22 - 3 P.M.	

Tower at Different Site Locations

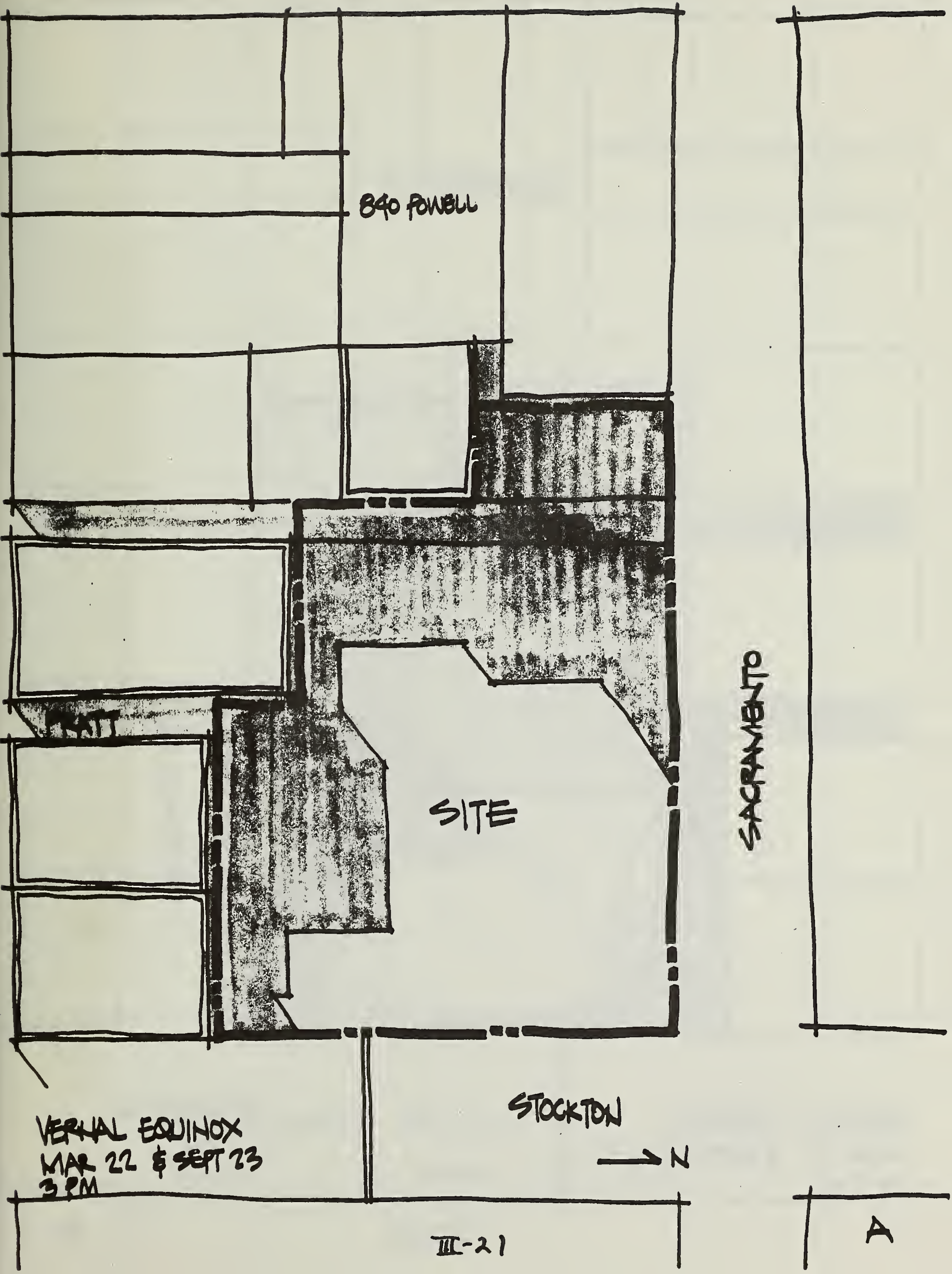
D	Vernal Equinox	Mar. 21 and September 23	2 P.M.
E	Vernal Equinox	Mar. 21 and September 23	2 P.M.
F	Vernal Equinox	Mar. 21 and September 23	11 A.M.
G	Vernal Equinox	Mar. 21 and September 23	10 A.M.

Tower at Different Locations (Including Family Unit Buildings)

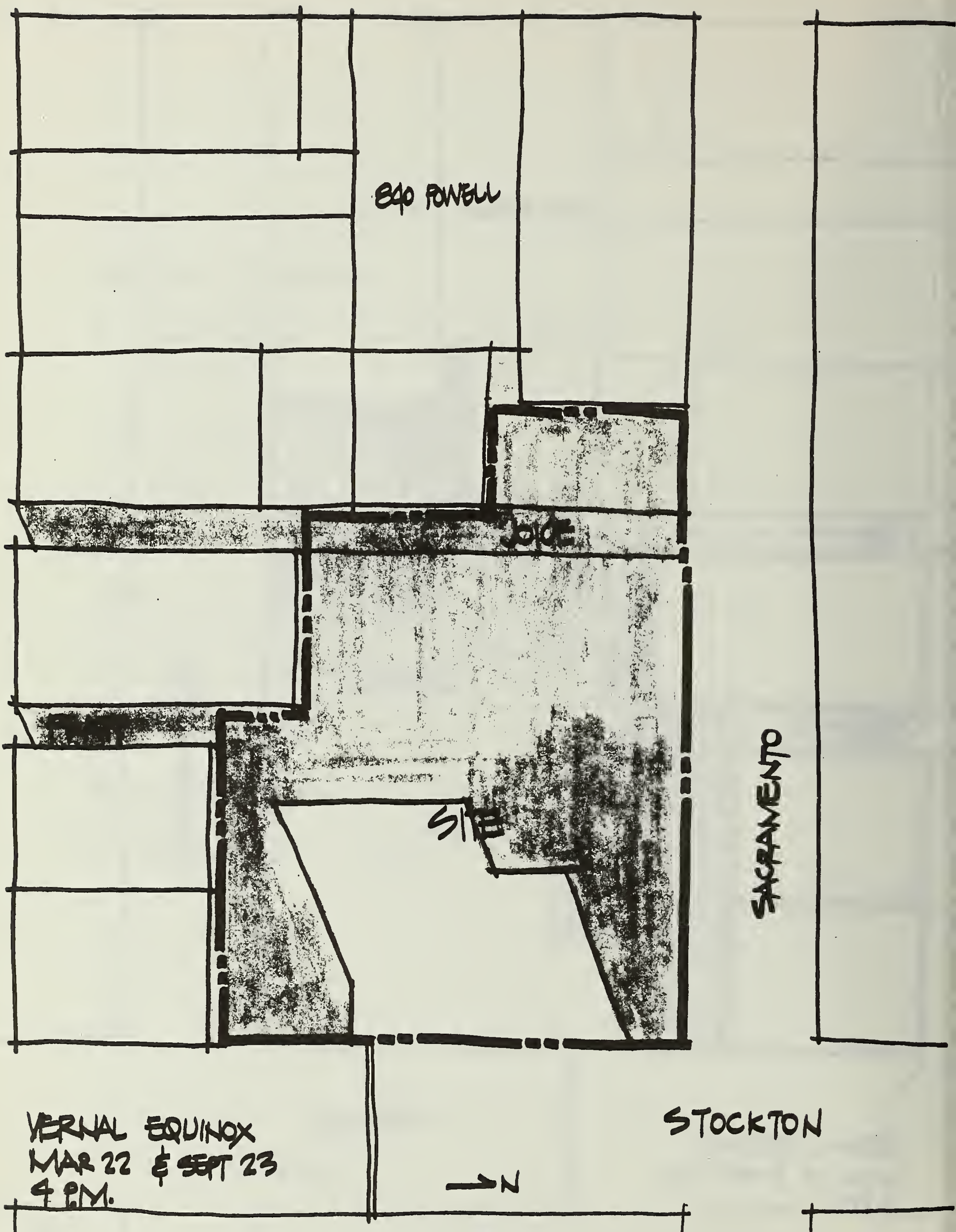
H	Vernal Equinox	Mar. 22 and September 23	1 P.M.
I	Vernal Equinox	Mar. 22 and September 23	3 P.M.
J	Vernal Equinox	Mar. 22 and September 23	11 A.M.
K	Vernal Equinox	Mar. 22 and September 23	1 P.M.
L	Vernal Equinox	Mar. 22 and September 23	3 P.M.

Tower at Proposed Location (Including Family-Unit Buildings)

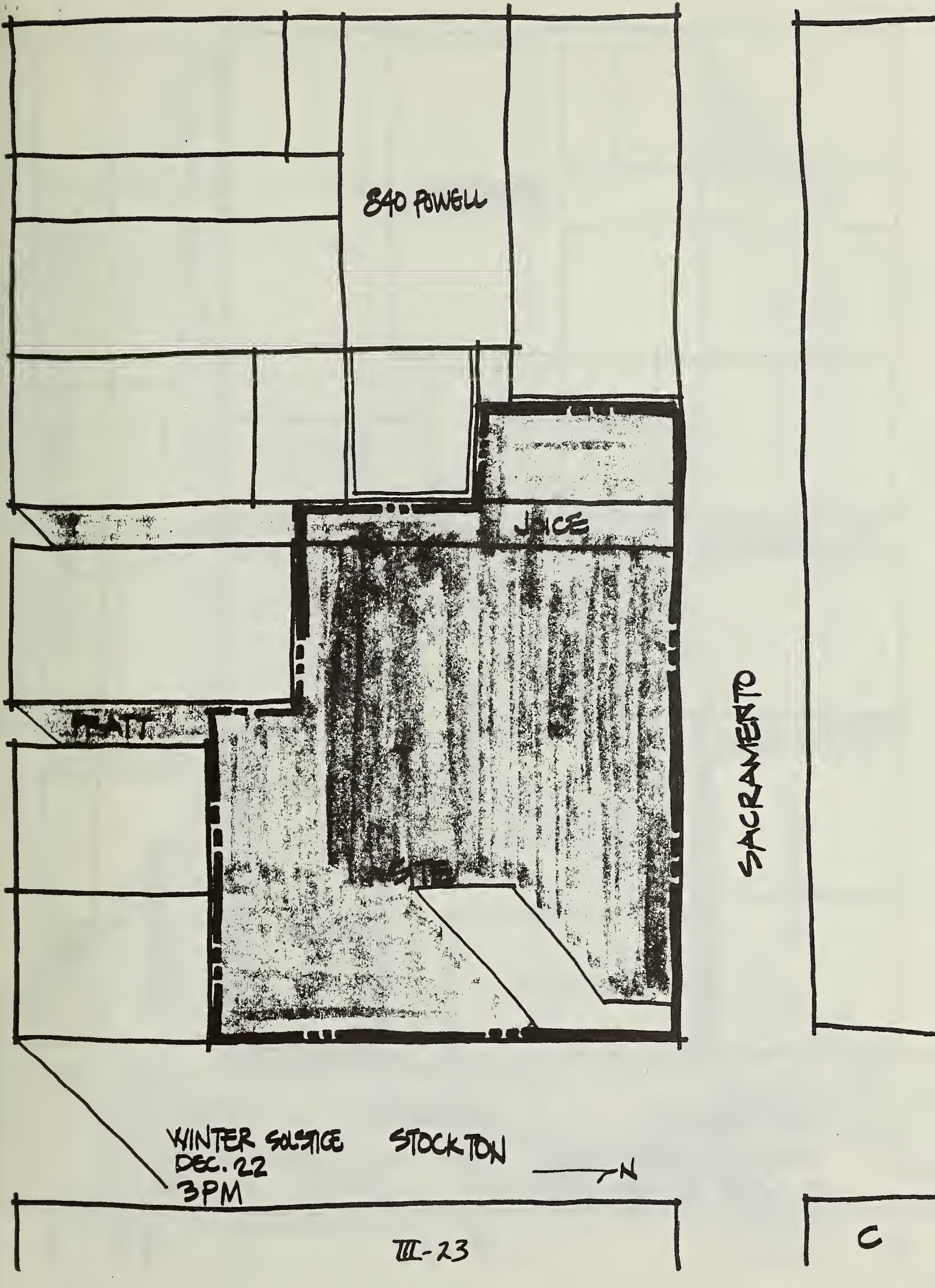
M	Vernal Equinox	Mar. 22 and September 23	2 P.M.
N	Summer Solstice	June 21	2 P.M.


840 POWELL
PRATT
SITE
SACRAMENTO
STOCKTON
N
A

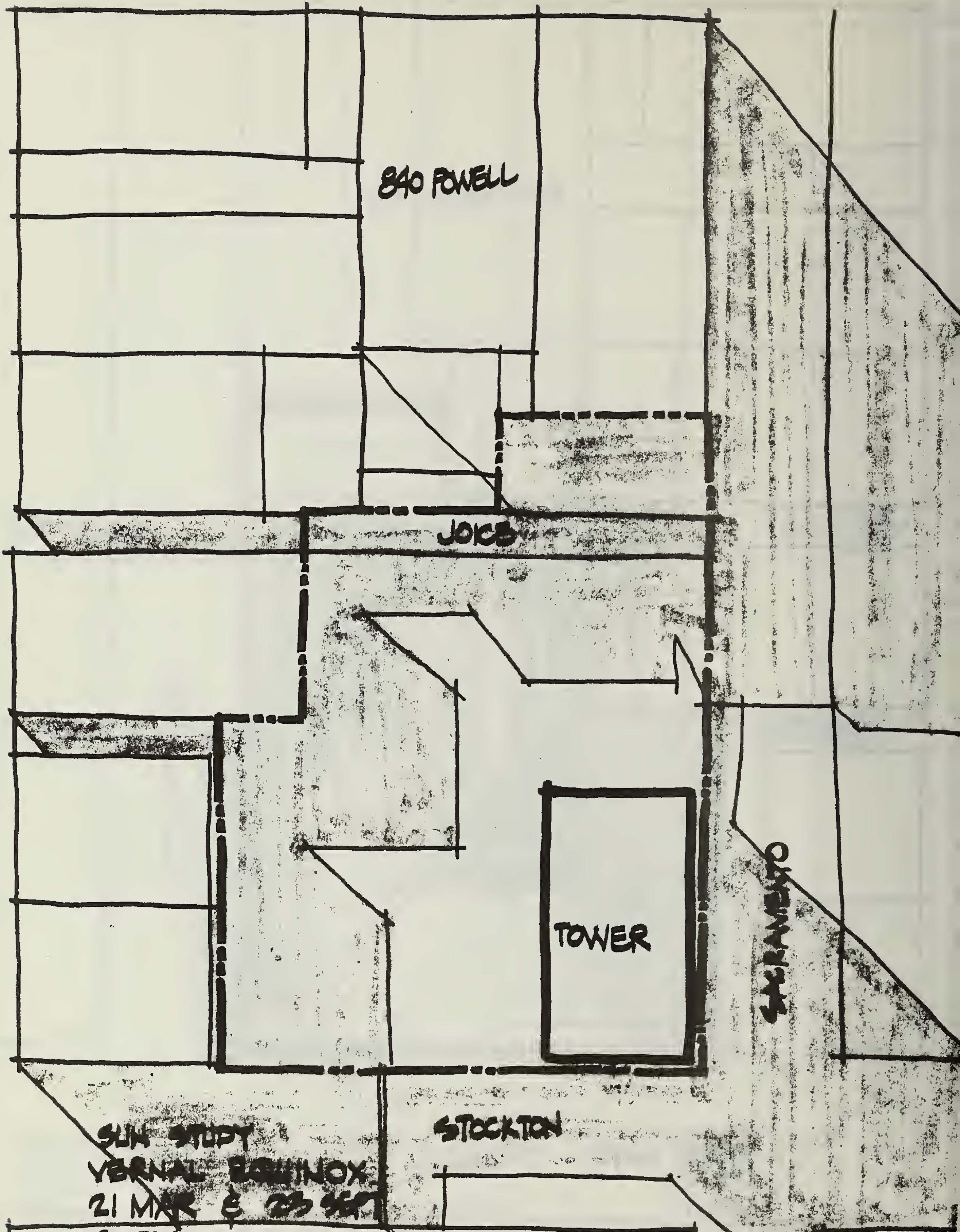
VERNAL EQUINOX
MAR 22 & SEPT 23
3 PM


840 POWELL
JOICE
PRATT
SITE
SACRAMENTO
STOCKTON
→N

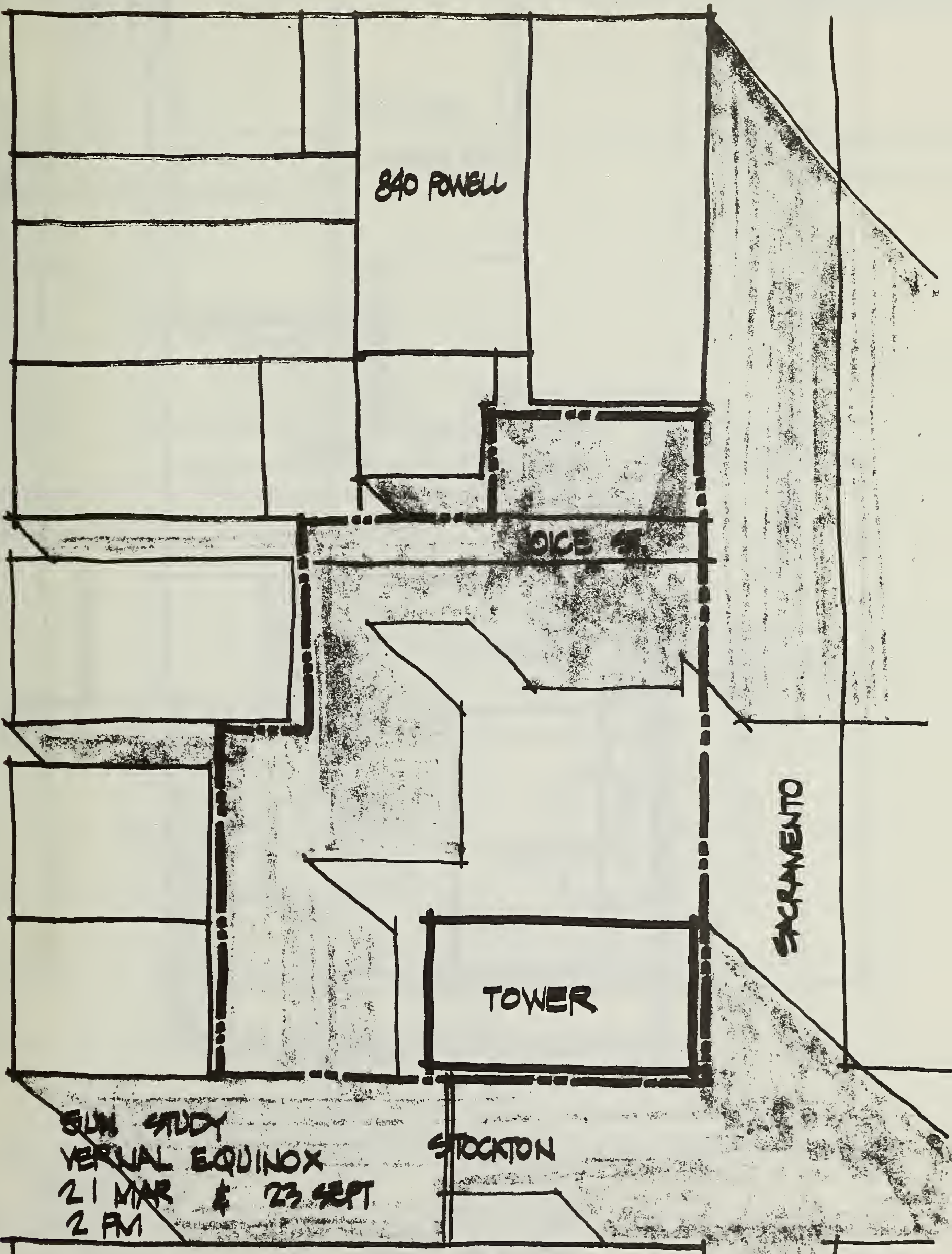
VERNAL EQUINOX
MAR 22 & SEPT 23
4 P.M.


840 POWELL
JOICE
PLATT
SITE
SACRAMENTO
STOCKTON
N
C

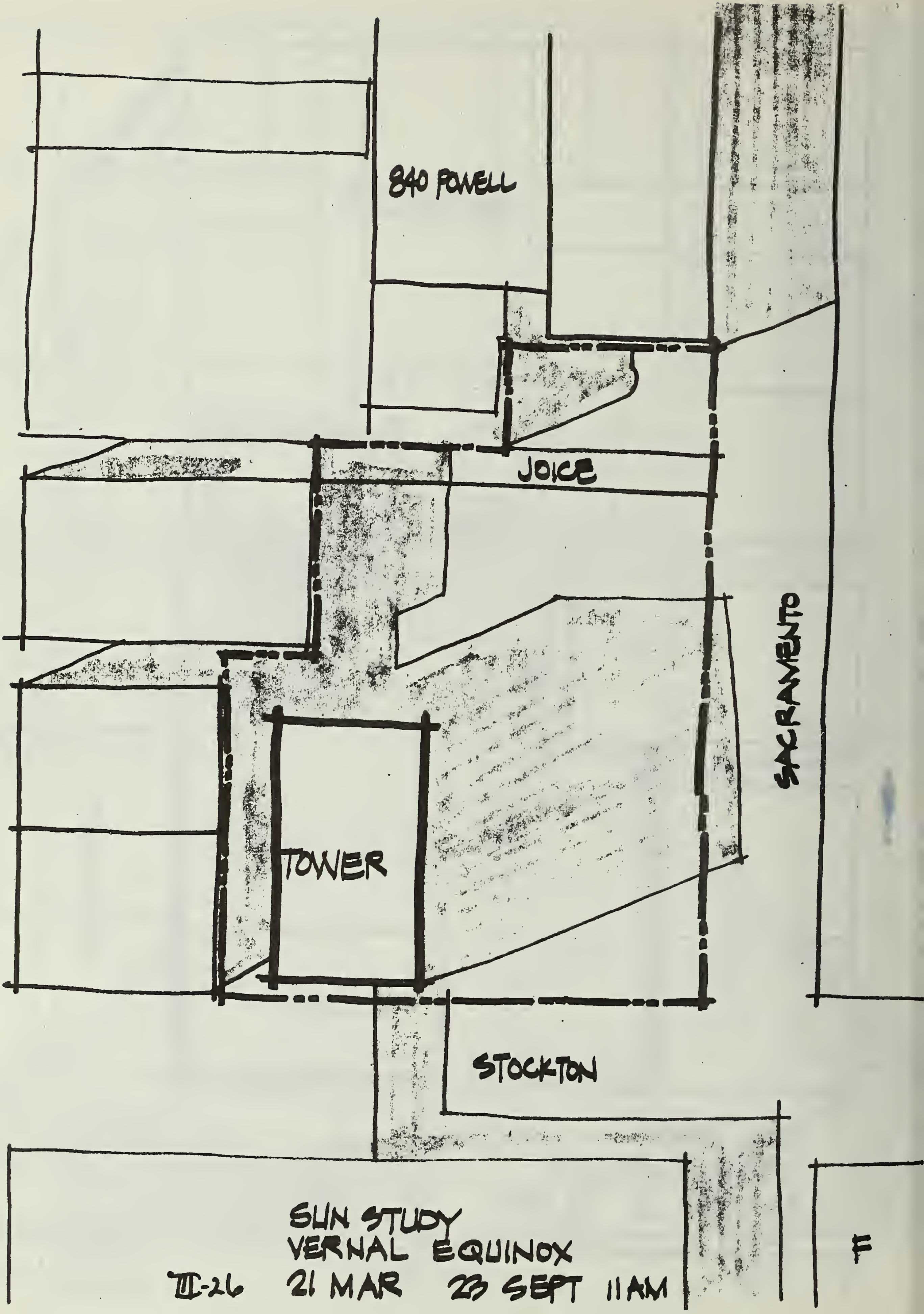
WINTER SOLSTICE
DEC. 22
3PM


840 POWELL
JOICE
TOWER
SACRAMENTO
STOCKTON

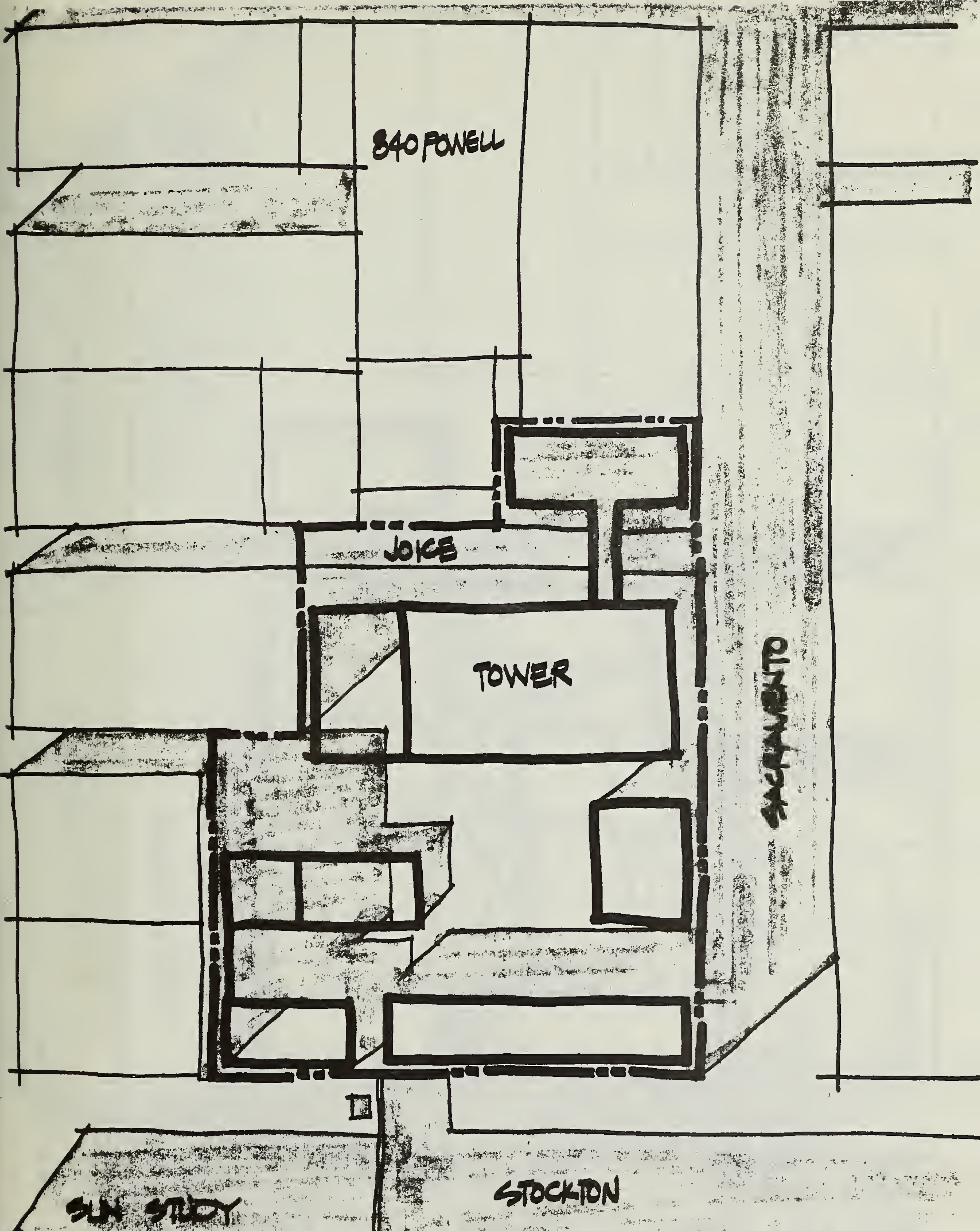
SUN STUDY
VERNAL EQUINOX
21 MAR & 23 SEPT
2 PM


840 POWELL
JOICE ST.
SACRAMENTO
TOWER
STOCKTON
E

SUN STUDY
VERNAL EQUINOX
21 MAR & 23 SEPT
2 PM


840 POWELL
JOICE
SACRAMENTO
TOWER
STOCKTON
F

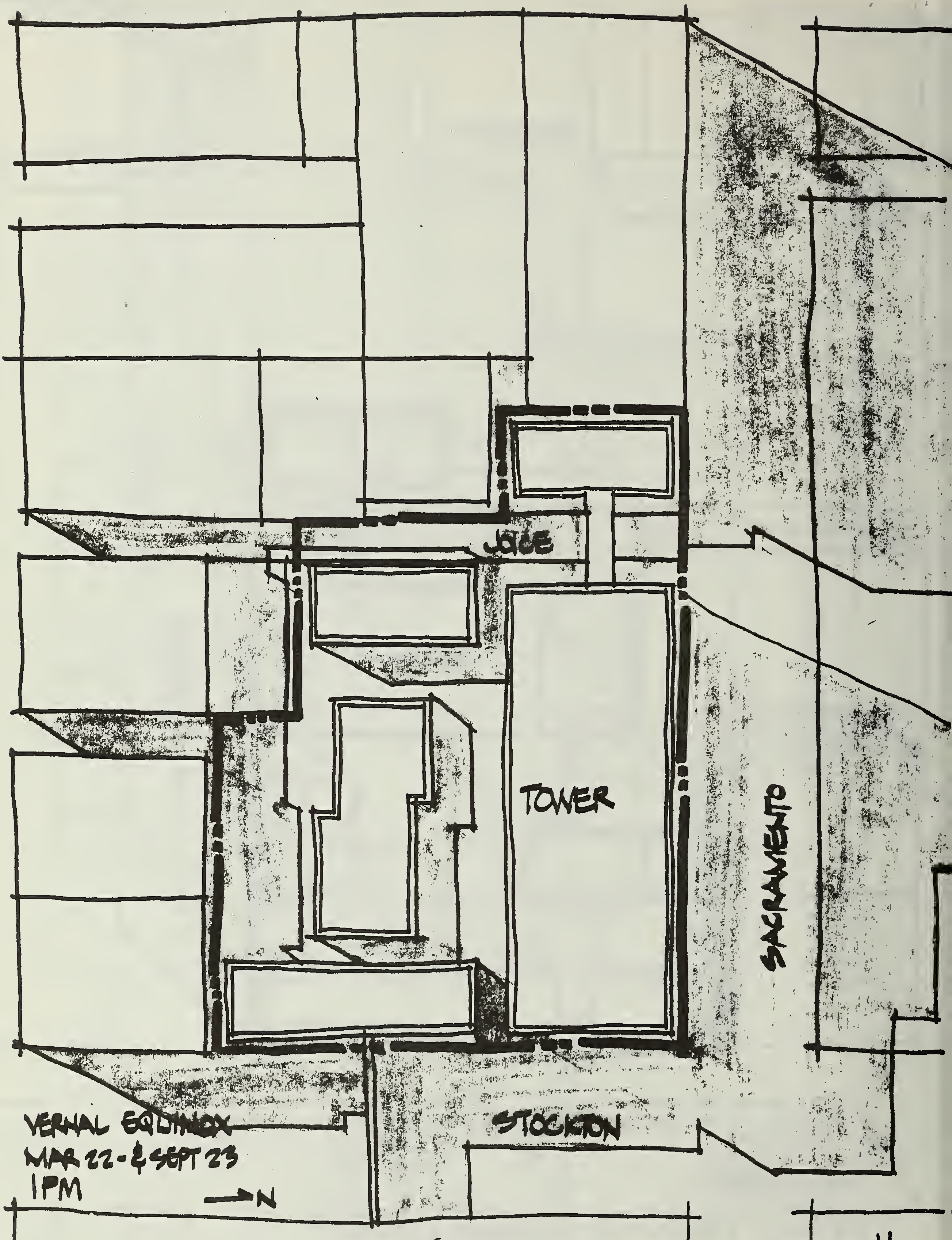
SUN STUDY
VERNAL EQUINOX
III-26 21 MAR 23 SEPT 11AM

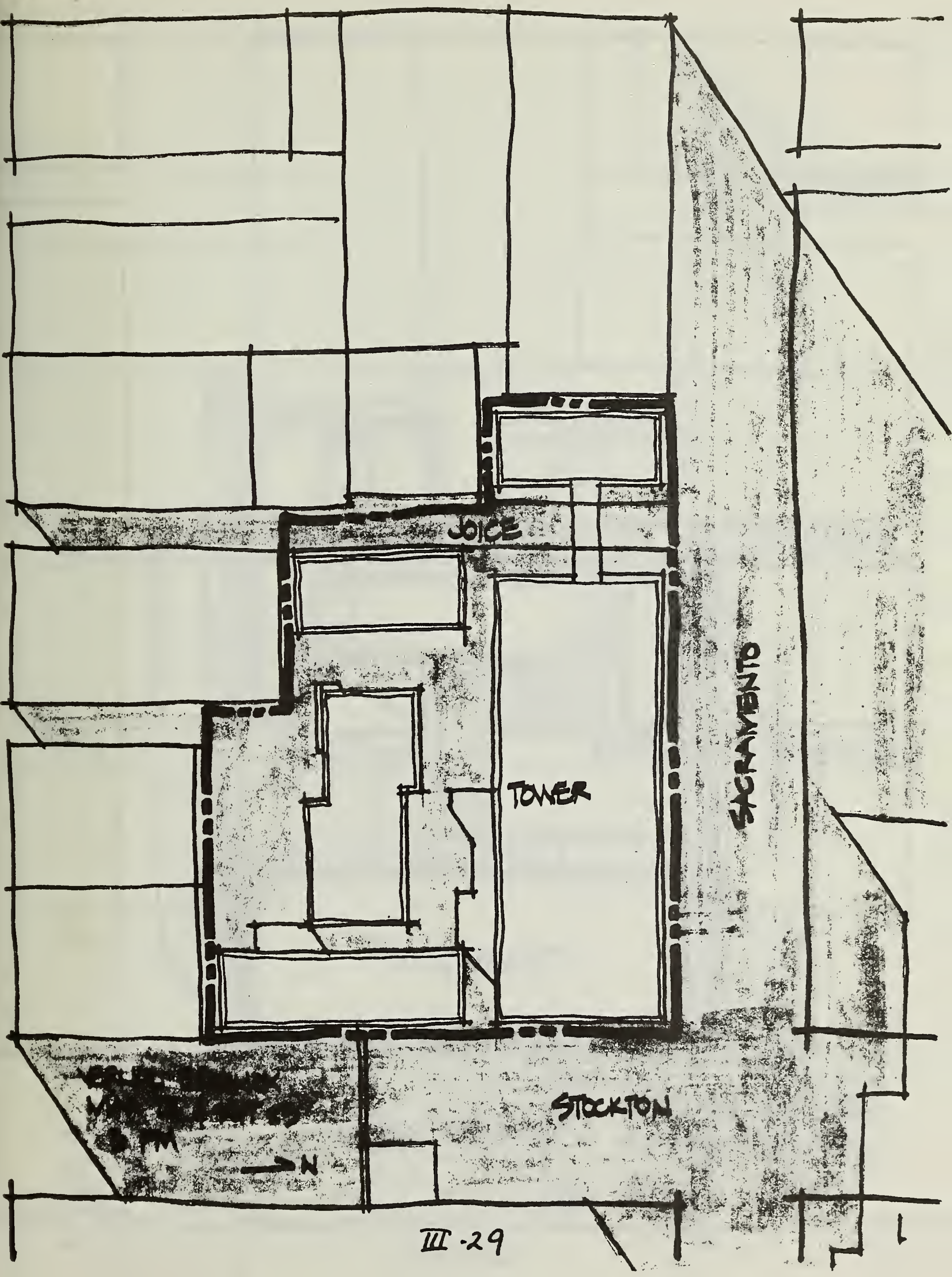

840 POWELL
JOICE
TOWER
SACRAMENTO
STOCKTON
SUN STUDY

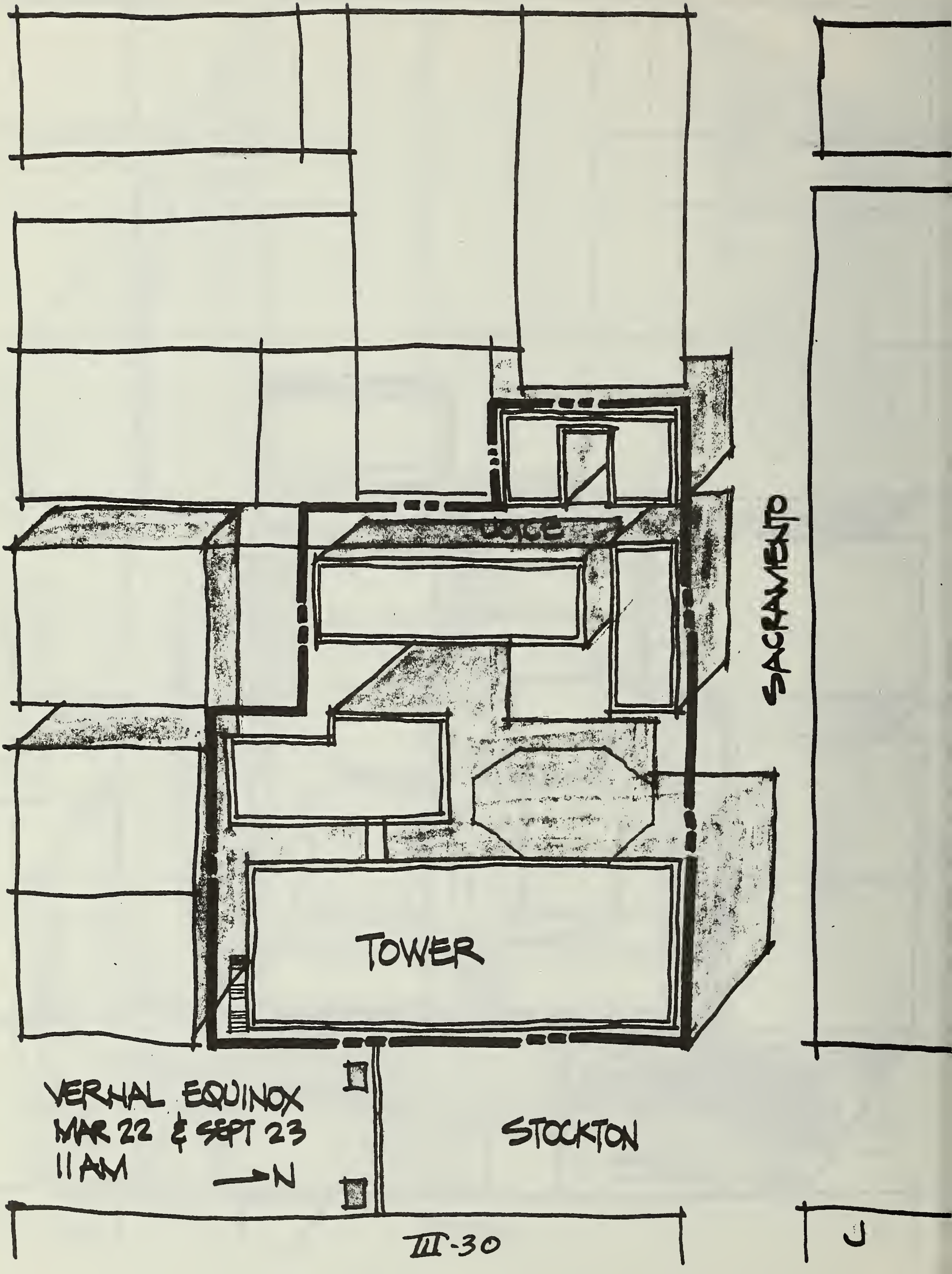
VERNAL EQUINOX - 21 MAR & 23 SEPT
10 AM

III-27

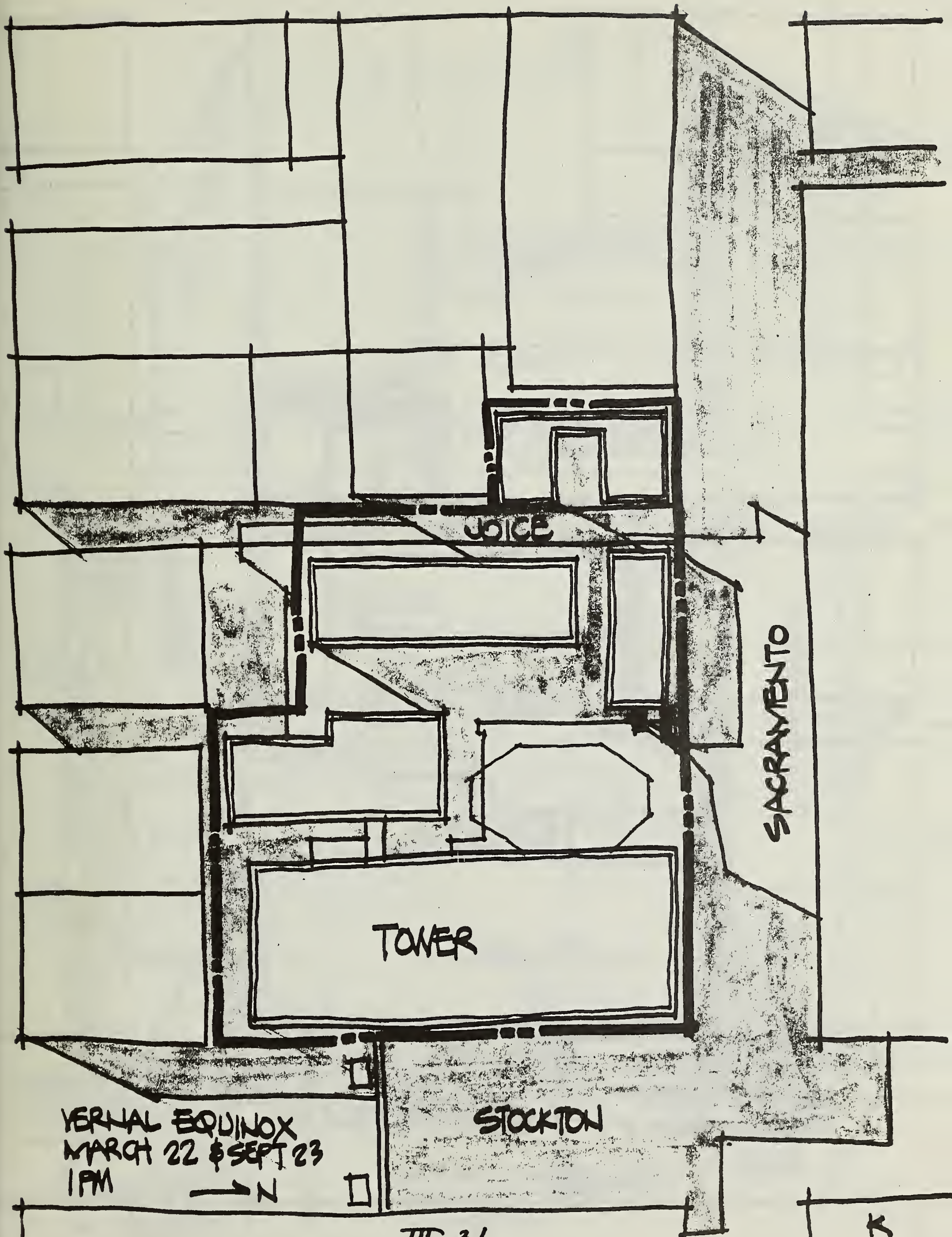
G


JOICE
TOWER
SACRAMENTO
STOCKTON
VERNAL EQUINOX
MAR 22 - & SEPT 23
1PM
→N

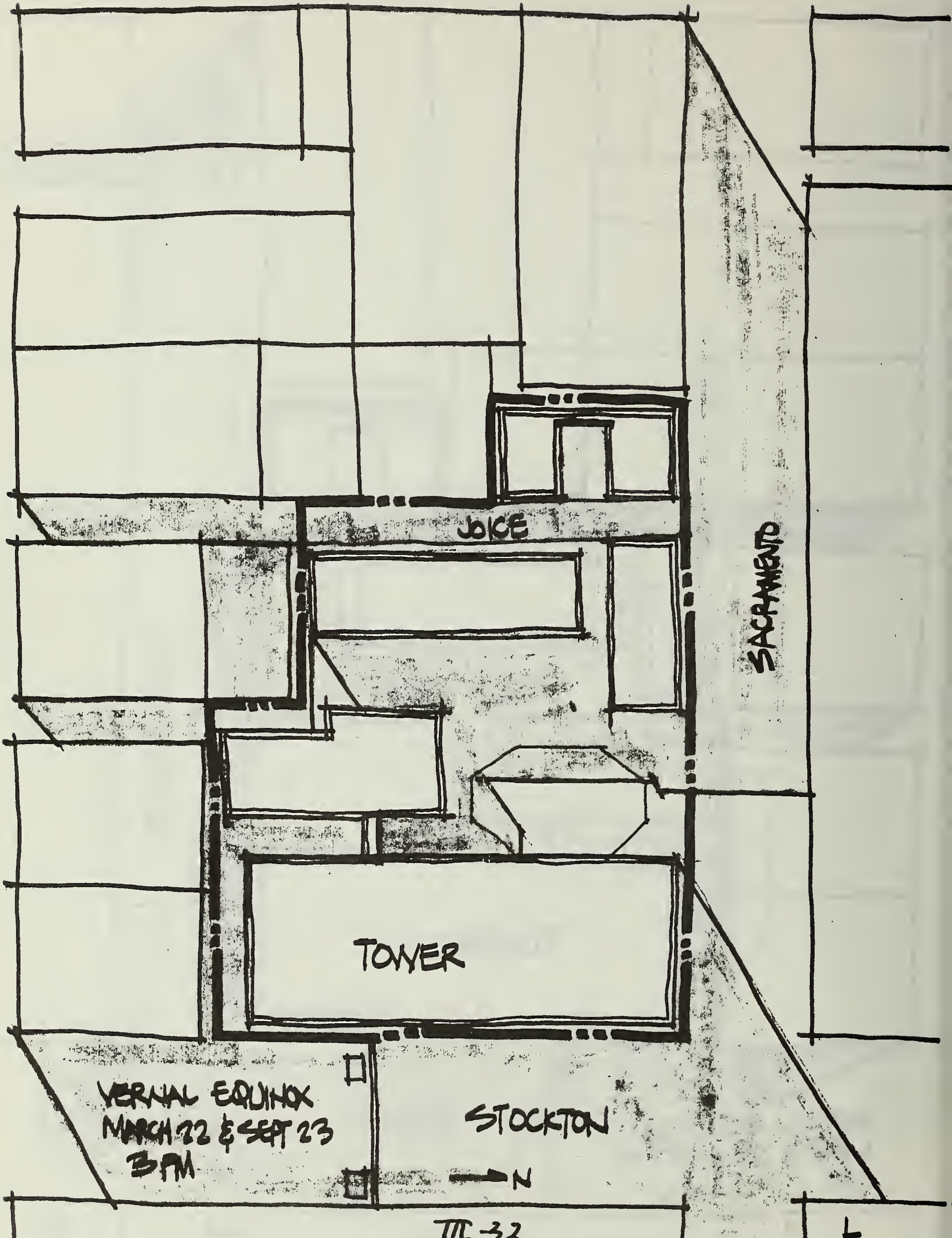

JOICE
TOWER
SACRAMENTO
STOCKTON
PM
N

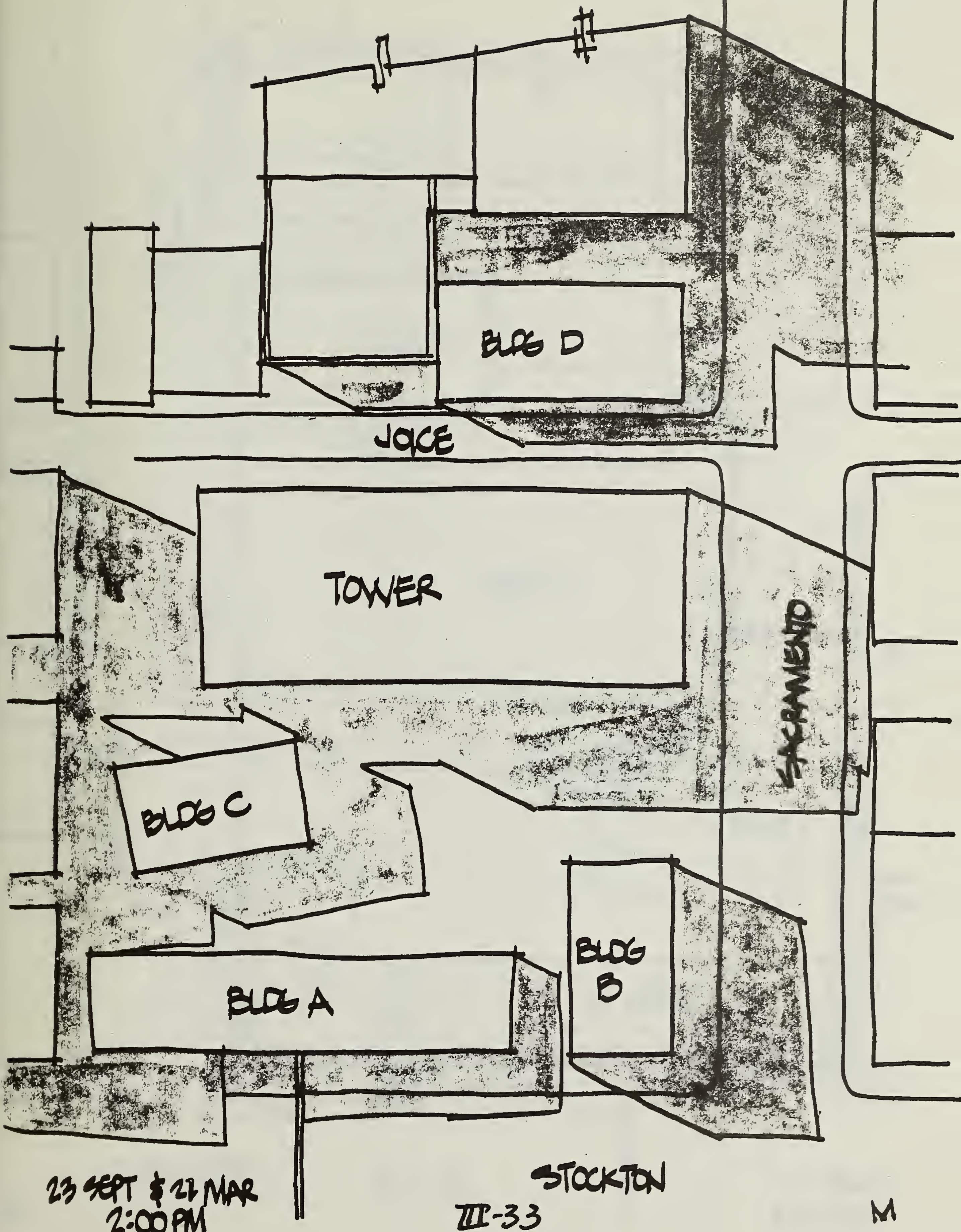

SACRAMENTO
TOWER
STOCKTON
J

VERHAL EQUINOX
MAR 22 & SEPT 23
11AM → N


JOICE
SACRAMENTO
TOWER
STOCKTON
K
N

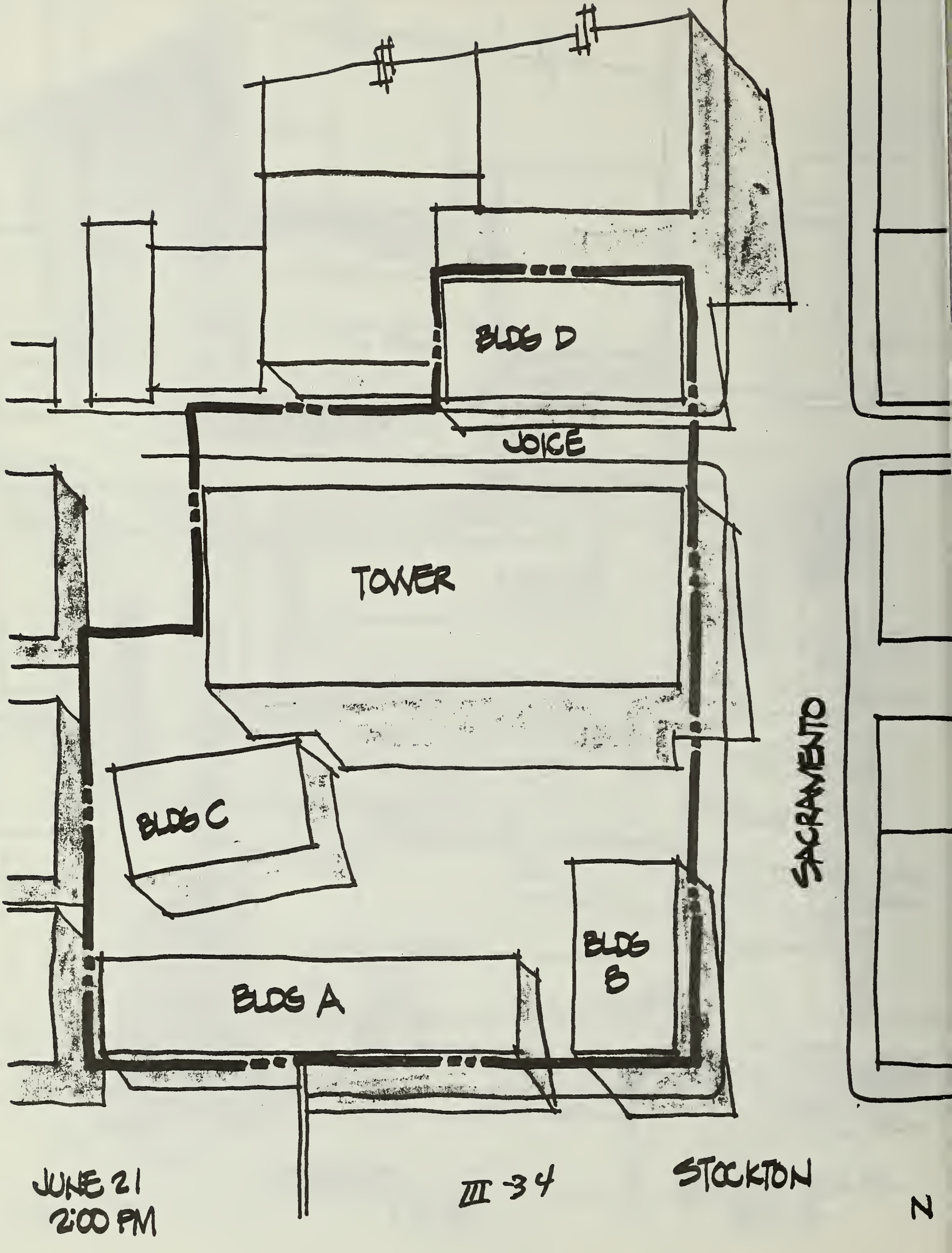
VERNAL EQUINOX
MARCH 22 & SEPT 23
1PM


JOICE
SACRAMENTO
TOWER
STOCKTON
VERNAL EQUINOX
MARCH 22 & SEPT 23
3PM
N
L


BLDG D
JOICE
TOWER
SACRAMENTO
BLDG C
BLDG A
BLDG B
STOCKTON

23 SEPT & 22 MAR
2:00 PM

M


BLDG D
JOICE
TOWER
SACRAMENTO
BLDG C
BLDG B
BLDG A
STOCKTON
N

JUNE 21
2:00 PM

PART IV

PROBABLE ADVERSE ENVIRONMENTAL IMPACTS WHICH CANNOT BE AVOIDED SHOULD THE PROPOSAL BE IMPLEMENTED

There are no major adverse impacts which cannot be avoided should the Project be implemented, however there will be several minor adverse impacts which cannot be avoided. One of these is the partial blocking of the views of approximately 19 nearby residential units. This is considered a minor adverse impact because the Project has been designed to minimize the blocking of these views to the Bay and the Project does not totally block any views.

In San Francisco, as well as in other areas of high density, newer buildings sometimes are constructed without regard to nearby property owners and a total blocking of views can result. That is not the case in with this Project.

Building D of the Project is adjacent to the uphill residential units and is a three-story family residential structure. It has been designed to its low level to reduce view blockages to the minimum. However, to comply with San Francisco's planning objective of higher structures towards the hilltop, the 13-story elderly residential tower is next on the uphill side. This compromise with the San Francisco planning objectives is viewed by HUD as an acceptable modification. However, it is noted that the compromise does deprive a number of Project units from views of the Bay had other building configurations been utilized to maximize Project view amenities. HUD feels the lose of views from Project units and the compromise to minimize nearby partial view blocking is an acceptable solution. The Project appears to provide a good balance between the City's planning objectives, partial view-blocking of certain nearby residential units, and restricting view amenities of Project residents.

Another minor adverse impact on the Project will result from the noise from Sacramento and Stockton Streets. HUD is requiring mitigating measures to assure an acceptable living environment in the Project.

Air pollution from vehicular traffic in the Project parking garage and from Sacramento and Stockton Streets are adverse impacts. HUD is requiring mitigating measures to assure the Project parking garage is properly ventilated and the Project is designed to maintain health standards in the Project.

In order to mitigate the effect of the steepness of Sacramento Street, HUD will require three rest stops to be installed between Stockton Street and the Project boundary west of Joice Street. This will be done in consultation with the Department of City Planning and subject to City approval. Thus the elderly will not have to negotiate the entire hill at one time.

The loss of existing open space prior to construction of the Project is minor. The continued maintenance of the area as open space and development as a park for recreational uses is unlikely due to the method of public bond financing and the topography of the site.

Possible slight adverse impacts may result from the Project due to the utilization of water, the production of garbage, the consumption of electrical power and natural gas and the slight increase in storm water run-off. With the exception of the water run-off, the other adverse impacts will reduce similar impacts from elsewhere in San Francisco. This is because most of the future residents of the Project are now residing in San Francisco and it is assumed they are consuming or producing somewhat similar amounts of power, water, garbage and other related residential by-products and consumptions.

PART V

RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The Project is a long-term operation to provide housing for a number of low income elderly persons and low income families. That is the long-term productivity of the Project. The short-term use of the environment by Project action is the construction stage of the Project.

The construction activities provide certain short-term positive and negative impacts. The positive impacts in the short-term are the employment, and purchase of materials, supplies, furniture and equipment.

The short-term negative impacts are the disruptions to traffic circulation due to construction activities, the noise of construction equipment and the dust caused by construction activities. These adverse impacts are minimized by compliance with San Francisco City ordinances.

The trade-off is between these short-term adverse impacts and the long-term provision of housing. HUD feels the short-term adverse impacts are minimal and has established procedures to assure compliance with mitigation measures. The long-term productivity is very beneficial in alleviating, to a degree, the human suffering from overcrowded and often over-priced housing for low income elderly persons and low income families. The balance is clearly in favor of the long-term productivity.

The long-term productivity of providing housing does close options for other uses of the site. These other uses are considered in the various alternatives considered for the Project. Again, on balance, HUD believes the provision of low income housing is the proper choice over the other alternatives. Considering the great need for such housing, HUD notes that it also serves to further the legislative mandate on the Department to assist in the provision of housing for low and moderate income individuals and families.

PART VI

IRREVERSIBLE AND IRRETREVIABLE COMMITMENTS OF RESOURCES WHICH WOULD BE INVOLVED

The Project land would be committed to the Project for long-term residential use and would not be retreviable until destruction of the structures or a change in use of the Project. Neither of these two possibilities are envisioned at this time.

Building materials necessary to construct the Project will be utilized and irreversibly committed. Potential salvage value after long-term utilization is not considered here.

The partial blockage of views from certain nearby residential units is a long-term irreversible amenity that is diluted. The construction of the Project will preclude modification of its blocking action.

Other minor environmental impactions for Project consideration relate predominately to the exiating adverse environmental elements and are not caused by the Project itself. These are principally the air and noise impactions from traffic on Sacramento and Market Streets. Infrastructure and service consumption factors are long-term and essentially irreversible. These are, however, transfers from other areas in San Francisco because the Project residents are now residing and consuming elsewhere in San Francisco.

There would be a minor long-term commitment of labor to maintain and service the Project. This is a beneficial commitment because of the current unemployment in San Francisco.

There would be a long-term commitment of Federal financial assistance to the Project. This could be as long as 40 years, the maximum term of a mortgage insured development. The exact amount of fund commitment cannot be ascertained until the Project is developed and occupied. This is because Section 236 assistance is to subsidize tenant rents doen to an equivalent maximum of a one percent mortgage interest rate. In dollar figures, the estimated replacement cost (for mortgage insurance) of the Project is $6,194,130. The estimated annual Section 236 payments are $416,372. Some families and individuals may have such low incomes that they cannot afford to pay 25 percent of their income for rent. For these families and individuals, a rental assistance program is available from HUD and $58,582 is estimated as the annual amount of rental assistance that will be available for qualified Project residents.

There will be a long-term commitment of local services to the Project. These include, police, fire, health, welfare and educational services.

PART VII

RECOMMENDED ACTION ON THE PROPOSAL

After review and study of the various assessments and findings of the Draft Environmental Impact Statement and comments received during its circulation, HUD has in this Final EIS responded to the comments and incorporated appropriate changes. HUD has determined that the benefits of providing needed low and moderate income housing in Chinatown outweigh the minor adverse impacts caused by and affecting the project, and such impacts can be successfully mitigated. Therefore the Department proposes to issue a firm commitment under Section 236 of the National Housing Act, and to approve the preparation of working drawings and financing documents by the sponsor, architect and contractor.

Final approval by HUD will not be made until after the Final Environmental Impact Statement has been properly circulated and full consideration given to all of the views received. Any participation by HUD in providing mortgage insurance, Section 236 and rent supplementation payments will also be contingent upon satisfactory compliance of the requirements of these programs by the sponsor.

APPENDICES

Appendix A.

FEDERAL, STATE AND LOCAL AGENCIES FROM WHICH COMMENTS HAVE BEEN REQUESTED

Office of Architectural and Environmental Preservation
Advisory Council on Historic Preservation
1522 "K" Street, Suite 430
Washington, D. C. 20005

Office of the Secretary
Attention: Coordinator of Environmental Quality Activities
U. S. Department of Agriculture
Washington, D. C. 20550

Executive Director of Civil Works
Office of the Chief Engineer
U. S. Army Corps of Engineers
Washington, D. C. 20314

Office of the Deputy Assistant
Secretary for Environmental Affairs
Department of Commerce
Washington, D. C. 20230

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Regional Administrator
Environmental Protection Agency
100 California Street
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Office of the Associate Director
Water Resources Council
2120 "L" Street, N. W., Suite 800
Washington, D. C. 20037

Small Business Administration
450 Golden Gate Avenue
San Francisco, CA. 94102

Director, Division of Environmental Affairs (5)
Energy Research and Development Administration
Washington, D. C. 20545

Commissioner's Advisory Council on Environmental Quality
Federal Power Commission
825 N. Capitol Street, N. E.
Washington, D. C. 20426

Regional Environmental Officer
Department HEW
50 Fulton Street
San Francisco, CA. 94102

Director, Office of Environmental Project Review (10)
Department of the Interior
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Washington, D. C. 20240

Council on Environmental Quality (5)
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Director, Office of Economic Opportunity
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Washington, D. C. 20506

Secretarial Representative
Department of Transportation
450 Golden Gate Avenue
San Francisco, CA. 94102

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Department of the Army
South Pacific Division, Corps of Engineers
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Deputy Administrator
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Special Assistant to the Secretary
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7819 New State
Department of State
Washington, D. C. 20520

Assistant Secretary for Environment and
Urban Systems
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Washington, D. C. 20590

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Department of Transportation
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President
League of Women Voters
12 Geary Blvd., Suite 605
San Francisco, CA. 94108

Honorable Quentin Kopp
President
San Francisco Board of Supervisors
City Hall
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Mr. Arthur Evans
Executive Director
San Francisco Redevelopment Agency
P. O. Box 646
San Francisco, CA. 94109

Department of Labor
Attention: Environmental
Officer
450 Golden Gate Avenue
San Francisco, CA. 94102

Mr. Ernest Slight, Director
Environmental Impact Division
Office of Environmental
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Washington, D. C. 20461

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Document Service
Environmental Law Institute
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Mr. John Jacobs, Executive
Director
San Francisco Planning and
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Mayor
City of San Francisco
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Mr. James Jaquet, Director
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Revan A. F. Tranter, Executive Director
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Paul Watt, Executive Director
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Erwin Williams
Bolles Associates
14 Gield Street-
Jackson Square
San Francisco, CA 94133

APPENDIX B BIBLIOGRAPHY

San Francisco Chinatown Housing And Recreation Program, Sedway/Cooke, San Francisco, CAlifornia, March, 1972.

The Urban Design Plan For The Comprehensive Plan Of San Francisco, Department of City Planning, May 1971.

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The Section 236 Interest Supplement Program

The Section 236 Interest Supplement Program established by the Housing and Urban Development Act of 1968 was the Federal Government's major operating program to reduce costs on certain rental and cooperative housing projects designed for occupancy by low-income families. It was the logical "next" step for many public housing residents who were attempting upward mobility toward eventual home ownership which became available under the provisions of Section 235 of the same 1968 Housing and Urban Development Act. Although the Section 236 Interest Supplement Program is no longer available for new projects, the funds were reserved in 1974 under the contract reservation signed that year and will be available for Mei Lun Yuen.

Under this program, HUD makes monthly payments to mortgagees on behalf of mortgagors, of a part of the interest on market-rate mortgages financing rental or cooperative housing projects for lower income families. When the program was in effect, interest-reduction payments could also be made on rental or cooperative housing projects owned by private nonprofit, limited-dividend or cooperative entities which were financed under a state or local program providing assistance through loans, loan insurance, or tax abatement.

Interest-reduction payments cannot exceed the difference between the amount required for principal, interest, and mortgage insurance premium on a market-rate mortgage and the amount required for principal and interest on a mortgage at one percent interest. The purpose of the payments is to bring the monthly rental charges down to a level that low-income families can afford to pay with at least 25 percent of their adjusted monthly income.

The sponsors of mortgages insured by the Federal Housing Administration under this Section of the Act and for the interest-reduction payments may be nonprofit, limited dividend, or cooperative entities.

Tenants and cooperative occupants must meet specified income requirements and be composed of one of the following:

- Be a family.
- Two persons related by blood, marriage or operation of law.
- Single (at least 62 years of age.
- Handicapped persons (no age requirement)

Ten percent of the dwelling units may be for single people under 62 years of age. Priorities will be given to those prospective tenants displaced by urban renewal, government action or national disaster.

The tenants adjusted income cannot exceed the approved income limits for the area in which the project is located and for the size of family. Adjusted income for the Section 236 program is equal to the current income from all sources before taxes of all members of the family occupying the unit excluding a five percent deduction for unusual or temporary income, less $300 for each minor and less any earnings of each minor.

The tenants' adjusted income must be certified every year. Upon completion of the annual certification any needed adjustment in rental charges will be made.

It should be noted that during the initial rent-up period, over-income tenants are required to pay the fair market rental. After the initial rent-up period, however, the eligible tenant pays the basic rental or 25 percent of income - whichever is greater. Over-income tenants pay twenty-five percent of income but not in excess of the fair market rental.

The basic monthly rental charge is based on operation of the project at a one percent interest rate mortgage. HUD/FHA makes monthly assistance payments directly to the mortgagee to reduce the mortgage payments from market rate to an amount required for a one percent mortgage. Eligible tenants then pay the greater of the basic rental charge or 25 percent of adjusted income. The fair market rental for over-income tenants is based upon operation of the project at market interest rates.

The monthly rental charges may include all utilities except telephone. However, often the living units are individually metered and the tenants pays his own electric bill.

All sponsors must have an approved management program and realistic plan for providing socially-oriented management and related human services. The housing owner is expected to assist tenants in application preparation. The management has the fiscal responsibilities for monthly statements and the recertification of incomes each year. This management program and plan must be approved by FHA at least thirty days prior to initial endorsement.

Financing of Section 236 developments are generally by private lenders although nonprofit mortgagors are eligible for the Government National Mortgage Association (GNMA) Tandem Plan. In addition, state or local governments could obtain financing through loans, or under state or local programs of loan insurance or tax abatement.

Five or more units are eligible for the Section 236 program. These units may be detached (need not be contiguous), row, walk-up or elevator structures. The units - to be eligible for the program - must be new, or existing ones involving major rehabilitation. While the projects may include non-dwelling commercial space, they must be predominantly residential. The project must be designed so that the basic rent is less than 25 percent of maximum income limits.

The maximum term of the insured mortgage under this program is 40 years.

APPENDIX D

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
SAN FRANCISCO AREA OFFICE
ONE EMBARCADERO CENTER, SUITE 1600
SAN FRANCISCO, CALIFORNIA 94111

REGION IX
450 Golden Gate Avenue
P.O. Box 36003
San Francisco, California 94102

AUG 27 1976

IN REPLY REFER TO:
9.1SE

Mr. Herbert Rhodes
Attention: Gene Itogawa
State Historic Preservation Office
P. O. Box 2390
Sacramento, CA. 95814

Dear Mr. Rhodes:

This is to request your comments and concurrence in our finding that the Mei Lum Yuen project located at Sacramento and Stockton Streets in San Francisco, consisting of an elderly housing tower and single family units, will have no effect on the Donaldina Cameron House, a San Francisco Landmark which may be potentially eligible for the *National Register of Historic Places*.

Cameron House at 920 Sacramento Street is directly across from this proposed housing project.

For the convenience of review, we are attaching a copy of the project description, two site sketches, the draft of our Cultural Resources assessment and six snapshots of the Cameron House and project site.

In order that the project may proceed on schedule, we would appreciate your earliest possible reply.

Sincerely,

Tad Masaoka
Environmental Clearance Officer

Enclosures

STATE OF CALIFORNIA—RESOURCES AGENCY EDMUND G. BROWN JR., Governor

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
POST OFFICE BOX 2390
SACRAMENTO, CALIFORNIA 95811
(916) 445-8006

November 2, 1976

RECEIVED
NOV 8 1976
U. S. DEPT. HUD
ENVIRONMENTAL BRANCH
SFAO

Mr. Tad Masaoka
Environmental Clearance Officer
Department of Housing and Urban Development
San Francisco Area Office
1 Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Masaoka:

I have received your letters of August 27 and October 21, 1976, transmitting the Draft Environmental Impact Statement for the Mei Lun Yuen Development of the Chinatown Redevelopment Area in the City of San Francisco.

As the Department of Housing and Urban Development will be providing assistance for the Mei Lun Yuen Development Project, compliance with the National Historic Preservation Act of 1966 is required. The Donaldina Cameron House is an historically significant structure eligible for inclusion in the National Register of Historic Places. The historical integrity of the structure should be preserved. The Final Environmental Impact Statement should fully assess possible impacts upon the Cameron House.

A determination of no effect by the Department of Housing and Urban Development appears premature without additional documentation. The Office of Historic Preservation is further unable to concur with the statement on page 1 of your August 27, 1976 enclosure that "the structural architectural features of the Cameron House will not be affected by this project because the house is outside of the project area." Indeed, visual access would be diminished by the construction of a 13-story structure directly across from the Cameron House.

The Final Environmental Impact Statement should include an assessment of the proposals for possibly reducing the scale and bulk of the tower. Alternative proposals may include the adaptive use of existing buildings located in Chinatown as elderly housing units. The rehabilitation of the International Hotel to provide low income housing for senior citizens represents a feasible alternative to erecting multi-story towers. Such proposals to conserve urban neighborhoods ~~is~~ are consistent with Secretary of Housing and Urban Development Carla Hills' concern for reuse of existing housing stocks.

In addition, the Draft Environmental Impact Statement failed to adequately assess the potential for archeological resources. Vacant lots in urban San Francisco afford a unique opportunity to initiate archeological testing programs to identify possible significant historic or prehistoric cultural values.

[illegible]

Please do not hesitate to contact Eugene Itogawa of my staff should you require further assistance in this matter.

Sincerely,

Dr. Knox Mellon
Historic Preservation Coordinator

F-2/2

cc: Mr. Louis S. Wall
Advisory Council on Historic Preservation
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Denver, Colorado 80225

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IN REPLY REFER TO:

November 24, 1976

9.1SE

Mr. Eugene Itogawa
Office of Historic Preservation
Department of Parks and Recreation
State of California
Post Office Box 2390
Sacramento, California 95811

Dear Mr. Itogawa:

Following an extensive conversation with Mr. Bill Seidel of your staff, HUD has conducted an exhaustive search of City records to determine whether there is a likelihood of archeological artifacts being present on the Chinatown Redevelopment Site. As discussed in detail below, it appears that the original grading was done at the time the reconstruction took place after the earthquake and fire in 1906. These buildings have all been demolished and the site is currently being graded by the San Francisco Redevelopment Agency in preparation for its being offered for sale by that agency, either for the Mei Lun Yuen Development or some other one if this proposal is not approved by HUD.

Since the difference of opinion regarding the Donaldina Cameron House has been resolved by us in our earlier conversation, may HUD now have a letter of concurrence from you regarding the 'lack of impact' on the Donaldina Cameron House and the probability that no archeological artifacts exist on the site and thus no archeological search will be necessary.

I would like to further request that this letter be forthcoming at an early date from you since the Final EIS is virtually ready for circulation and we need your letter for inclusion in this document. HUD needs the letter in order to approve the Final EIS for distribution; alternatively, HUD will have to prepare a reply to your earlier letter that the 'differences' and the archeological question are being resolved in accordance with the provisions of the National Historic Preservation Act of 1966. The inclusion of the requested letter from you is greatly preferred.

In order to determine whether there is any likelihood that archeological artifacts are present at the Mei Lun Yuen site in the Chinatown Redevelopment Area, an extensive search was made of City records pertaining to that site. A set of Sanborn Maps, slightly damaged by fire and rat erosion, located at the San Francisco Water Department Offices at 425 Mason Street which have been updated to September 1905 show the entire site as developed with two and three story frame buildings. There was one two-story brick building on the interior of what is now Joice Street and next to it a partial frame and brick building. All of the remaining buildings were frame. The ground floor (referred to as basement on the maps) of the three-story frame buildings were, in each instance, used as saloons. The upper floors were tenements. According to officials at City Hall in the Department of Public Works and in the Planning Department, residential areas such as this were never excavated for the usual two and three story frame buildings. No basements or cellars were ever excavated and the buildings were merely constructed on the land at grade.

Sanborn maps at the same location which are updated to 1912 show three buildings which have been constructed along Sacramento and six other buildings in the interior of the site along Joice and Emmett Streets as well as along Stockton. The remainder of the parcel is shown as still being vacant. These were all frame buildings.

A reading of the book, The Earth Shook, The Sky Burned, by William Bronson, Doubleday and Co., Garden City, N.Y., 1959, indicates that the entire area was burned out in the fire that followed the 1906 earthquake. A photograph shows the street looking down Sacramento from Powell Street as the fire was moving up the hill. All of the buildings along Sacramento are shown on an angle as is the original Donaldina Cameron House building across the Street. This building was dynamited in an attempt to save the Fairmont Hotel as the fire roared up the street.

City Hall records indicate that all of the buildings which were on the site when it was acquired by the San Francisco Redevelopment Agency were constructed after the 1906 fire and earthquake with one exception. The twin-wood frame building at 921-935 Sacramento is shown as having been constructed in 1900. However, City officials believe that this date is in error since their records show that the entire area was burned out in the fire. A comparison of the 1905 and the 1912 Sanborn maps indicates the buildings to be different so it would appear that the figure 1900 is in error.

These same Sanborn maps show the elevation of the intersections of Powell and Stockton Streets with Sacramento Street to be the same at the two dates. The cable car line which was located on Sacramento Street continued to run after the fire until the 1940's. It is believed by City officials that the original grading and cutting at the site was accomplished at the time these later buildings were constructed after the fire. Following the fire there was an original proposal to implement the old Bumnham Plan which would have changed the alignment of the major streets. However, rebuilding began so rapidly that it was soon determined it would be impossible to do so and the idea was dropped. In virtually all instances, the burned out areas were cleared, scraped and then cut to accommodate the new buildings that were to ber constructed.

In summary, a detailed examination of existing City records indicates that the entire Chinatown Redevelopment Area was completely destroyed in the 1906 earthquake and fire. It would appear that the original grading and cutting of the land occurred at the time of reconstruction after the fire on land that had been totally cleared and scraped for this rebuilding. Furthermore, it appears that the original buildings that were destroyed in the earthquake and fire had been constructed at grade on non-excavated or cut land. Cutting and excavating were not done for wood frame buildings used primarily for residences. (In the case of the saloons on the ground or street floors in three locations, this was a case of conversion -- the ground floors had previously been used as residences.)

Thus, the possibility of archeological resources being present on the site would appear to be virtually nil. However, the Office of Environmental Review in the City Planning Department will probably issue a conditional construction permit which will halt all activity if anything is found so that a survey can be made.

We await your early reply concurring in these two important issues confronting the Mei Lun Yuen proposal.

Yours very truly,

ORIGINAL SIGNED BY
GEORGE B. ADAMS

George B. Adams
Project Manager

9.1SE:ADAMS:rc 11/24/76 X6642

STATE OF CALIFORNIA—RESOURCES AGENCY EDMUND G. BROWN JR., Governor

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
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December 2, 1976

Mr. Tad Masaoka
Environmental Clearance Officer
Department of Housing and Urban
Development
San Francisco Area Office
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Attention Mr. George Adams
Project Manager

Dear Mr. Masaoka:

I have received Mr. George Adams' letter of November 24, 1976 regarding the proposed development of the Mei Lun Yuen Project in the City of San Francisco (9.1SE). Ms. Rosyln Cappelletti of the Department of Housing and Urban Development has consulted with members of my staff on November 16 and 18 in response to our initial letter of inquiry dated November 2, 1976.

Consultation between the Department of Housing and Urban Development and the Office of Historic Preservation has resulted in an agreement of no effect upon the Donaldina Cameron House located at 920 Sacramento Street, San Francisco. As staff to the State Historic Preservation Officer for California, I have determined that the proposed construction of the Mei Lun Yuen Center will not cause any changes in the qualities of the historical or cultural character that would qualify the Cameron House for the National Register of Historic Places.

My staff has also reviewed the additional documentation presented in your letter of November 24, 1976 and has concurred that previous ground disturbance activities have extensively altered the project site; however, my staff is in agreement with your recommendation that the Office of Environmental Review in the City Planning Department issue a conditional construction permit providing for an assessment of cultural resources if significant historical and prehistorical values are discovered during construction.

Please do not hesitate to contact Eugene Itogawa or William Seidel of my staff should you require further assistance in this matter.

Sincerely,

Dr. Knox Mellon
Historic Preservation Coordinator

G-4/245

cc: Mr. Louis S. Wall
Advisory Council on Historic Preservation
Box 25085
Denver, Colorado 80225

Honorable Art Agnos
Assemblyman Elect
District Office
350 McAllister Street
San Francisco, CA 94102

Attention Mr. Richard Ross

Mr. F. S. Dick Wichman, DD
Director, Donaldina Cameron House
920 Sacramento Street
San Francisco, California 94108

Appendix E Comments Received During Draft Circulation Period and HUD's Responses Thereto

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LOUIS E. VINCENT

November 10, 1976

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DELIVERED:

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Re: Draft Environmental Impact Statement
Mei Lun Yuen Development of the Chinatown
Redevelopment Area in San Francisco,
California

Dear Mr. Adams:

This office represents Francesca Apartments, the limited partnership which acquired 850 Powell Street, property adjacent to the proposed project, on November 1, 1976.

Enclosed is the report of Russell C. Pearson Associates, Traffic Engineers, which we hereby submit for your consideration in finalizing the Environmental Impact Statement ("E.I.S."). We hope it is of some assistance to you.

Our client only recently became aware of the proposed project and the draft E.I.S. Although there are several areas in the E.I.S. upon which our client would like to comment, including design in relation to project objectives, possible soil engineering problems, view obstruction, as well as traffic considerations, the short time period has allowed them only to engage the services of Russell C. Pearson & Associates. We understand that other groups are commenting on some of the additional areas our client would have liked to cover, and we trust that those other reports will be helpful in finalizing the E.I.S.

We have requested from Mr. David Kroot of your Department's Area Counsel Office that we be included on the

Department's mailing list concerning this project. We request that you verify that we are included on that list.

Very truly yours,

COOPER, WHITE & COOPER

Edward J. Wynne, Jr.

EJW:ss
Enclosure

Response to comments received from Edward J. Wynne, Jr., Attorney at Law of Cooper, White and Cooper

1. Your comments have been noted and two copies of the Final EIS will be sent to you.

2. HUD's response to the comments received from Russell C. Pearson of Russell C. Pearson and Associates in their letter addressed to you is located immediately following the copy of their letter in this EIS.

RUSSELL C. PEARSON & ASSOCIATES

Traffic and Transportation
Planning and Engineering
Consulting Services

780 West Olive Avenue
Sunnyvale, California 94086
Phone (408) 735-0460

November 10, 1976

Mr. Edward J. Wynne, Jr.
Attorney at Law
Cooper, White & Cooper
44 Montgomery Street
San Francisco, CA 94104

Dear Mr. Wynne:

Per your commission of 5 November, 1976, we have conducted a brief examination of probable traffic impacts associated with the proposed MEI LUN YUEN project planned for construction on the southwest corner of Stockton and Sacramento Streets in San Francisco, California.

In the course of our investigation we have examined the "Draft Environmental Impact Statement - Mei Lun Yuen Development", undated, and prepared by the San Francisco Area Office - U. S. Department of Housing and Urban Development (Hereinafter referred to as the E.I.S.).

We have also examined architectural drawings prepared by Architects Associated, 300 Montgomery Street, San Francisco, California, identified as follows:

Drawing No.	Description:	Date:
A-1		Aug. 29, 1975
A-2	Site Plan	" "
A-3	Sections	" "
A-4	Elevations	" "
A-8	Garage and Commercial Plan	" "
A-9	" " "	" "
A-10	Garage Plan	" "

We have counted and observed both morning and evening peak hour traffic flow in the immediate vicinity of the site. We have also reviewed traffic count records of the Traffic Division, City and County of San Francisco.

Based on these referenced sources, we offer the following opinions:

The public parking garage element of the project, as proposed, is certain to have a substantial and adverse impact on existing, and immediately adjacent, traffic flow. The degree of this traffic impact is not completely clear in the E.I.S.

Perhaps the two most important aspects of a garage's impact on the adjacent street system are its size and its style of operation. The E.I.S. recognizes these factors and suggests that the anticipated adverse traffic impacts could be mitigated by reducing the size of the garage . . . We agree. With all other things being equal, a reduction in garage capacity will reduce generated traffic.

The E.I.S. also suggests that the anticipated adverse traffic impacts could be reduced by establishing a cost schedule which would discourage long term parkers . . . We do not agree. This mitigating measure may, in fact, have just the opposite effect. By attracting only short-term parkers, the facility may create considerable high-volume increases in traffic within the facility and on the adjacent street system.

We have not been able to develop any information on this subject and since it is of such profound importance to this project, we suggest that the style of operation should be carefully examined both from the traffic and economic points of view.

The E.I.S. also suggests redesign of the garage facility to direct exiting traffic to Upper Stockton Street to mitigate the traffic impact on Sacramento Street. Specifically, the E.I.S. says "Traffic exiting from this point would all have to use California Street, but since its capacity currently exceeds its volume no problem would result" . . . We do not necessarily agree.

The E.I.S. indicates a 51 foot, curb-to-curb street width on California Street. Since California Street has two-way traffic and a tow-away westbound lane, its effective half-street width for peak P.M. westbound traffic must be approximately 25.5 feet or approximately 3.5 feet narrower than Sacramento Street.

The cable car operations constrict general westbound traffic flow on California Street in much the same fashion as slow moving westbound Municipal Railway motor coaches constrict general westbound traffic on Sacramento Street.

The street grade on California Street (between Stockton and Powell Streets) is lower than on Sacramento Street (between the same streets). Consequently, the westbound traffic capacity on California Street could be expected to be higher than the westbound traffic capacity of Sacramento Street. Time has not permitted a detailed study of the two street capacities, but we anticipate that they are in the same general order of magnitude.

On November 8, 1976, our counts indicate approximately 540 westbound vehicles on California Street between Stockton and Powell Streets from 5:00 to 6:00 p.m. On the same day and hour, our counts indicate approximately 585 westbound vehicles on Sacramento Street between Stockton and Powell Streets.

Therefore, if the project were modified to direct more exiting traffic to California Street it could be possible to cause both Sacramento Street and California Street to reach or exceed their respective traffic carrying capacities.

Further study of this potential situation is suggested, particularly if the proposed garage is reoriented to a short-term, high-volume operation as has previously been suggested.

The E.I.S. does not specifically address the question of traffic conditions during construction. A project of this magnitude and intensive land utilization, could require use of adjacent streets for construction purposes for a considerable length of time. We also note the relatively large land excavation required to construct the project. This is certain to significantly increase truck traffic in the vicintiy during the construction period.

With respect to garage design, several features stand out:

The geometric layout of the garage's Sacramento Street entrance/exit is reversed from normal traffic flow patterns. (When facing the entrance, traffic would enter on the left and exit on the right.) While this scheme theoretically avoids the conflict between the entering and exiting vehicles, from one-way Sacramento Street, it requires special and advance signing to avoid a more severe conflict of vehicles colliding head-on within or without the structure or colliding with other vehicles while backing out of the wrong entrance/exit.

Of even more concern is the problem of the transition of traffic flow from the reversed pattern to the regular right hand driving pattern. Within the proposed structure this transition will be accomplished approximately 25 feet from the single entrance/exit on Sacramento Street.

This condition will create considerable congestion within the structure and since the entering and exiting reservoir area appears to be only about one car length long, the resultant congestion is even more certain to back out into the westbound travel lanes of Sacramento Street. When that happens, the capacity of Sacramento Street will be substantially reduced from levels previously anticipated.

This situation is directly related to the style of operatio previously discussed. Some types of entrance/exit controls are far more efficient than others. They should be selected with considerable care and should be consistent with the operating style for greatest efficiency and economy. The reservoir space for the facility should allow sufficient space for safe normal storage as well as space for emergencies such as lost motorists, stalled vehicles, etc. We suggest further and careful study of the proposed Sacramento Street entrance/exit operations.

We are sorry that the time constraints of this assignment have not allowed us the opportunity to develop our investigation and findings in more detail. However, if you direct, we would be pleased to investigate further.

Very truly yours,

Russell C Pearson

Russell C. Pearson

Response to Comments Received From Russell C. Pearson of Russell C. Pearson and Associates in a letter addressed to Mr. Edward J. Wynne, Jr., Attorney at Law of Cooper, White and Cooper

1. Page 2, paragraph 5 and 6.

   By eliminating long-term parkers, the spaces would be used by short termers (two hours average at Portsmouth Square) dispersed throughout the day rather than concentrated during the rush hours. However, the added peak-hour capacity of Sacramento Street resulting from towaway zones being in effect has eliminated the necessity of attempting to favor one type of parker in the commercial garage. Therefore the recommended rate structure has been deleted from the Final EIS which should result in a more balanced ratio of long-term versus short-term parkers. (The towaway zones in effect from 4-6 pm free two additional lanes of traffic, increasing the carrying capacity of Sacramento Street for traffic other than busses from 600 to approximately 1080 vehicles per hour, or 24% more than required during the 5-6 pm period. Thus the effect of the towaway zones along Sacramento Street during peak hours provides adequate mitigation. (See comments received from Jeffrey Lee, City Engineer, through S. M. Tataran, Director of Public Works.)

   Insofar as economics are concerned, the parking structure is not needed to make the residential portion of the project economically feasible. Rather, it serves as a means of privately financing the costs of providing the platform upon which the residential buildings will be situated.

2. Page 2, paragraphs 7 and 8 and page 3, paragraphs 1-5.

   Your count of 540 westbound vehicles on California Street is well below the count obtained by the City's Transportation Section of the Department of City Planning. Using the 540 figure would result in even greater excess capacity than the 500 noted in the EIS. The comparison of California and Sacramento Street's capacities is not applicable due to the existence of the cable car tracks on California Street. These tracks are available most of the time as an extra traffic lane, thus virtually doubling the street's capacity, a condition not available on Sacramento Street. Thus, detailed studies of the street capacities have been completed and no further studies are needed.

3. Page 3, paragraph 6.

   In regard to construction impacts, the text on page II-3, paragraph seven has been corrected to specifically address this concern.

4. Page 3, paragraph 8.

With one-way directional traffic on Sacramento Street, the entrance/exit relationship of the garage is logical. Special and advance signing to avoid head-on conflicts will be incorporated in the garage design.

5. Page 4, paragraphs 1, 2 and 3.

HUD agrees with your comments. (Please also see the comments from Bolles Associates on the same point.) The conflicting crossouers necessary so close to the Sacramento entrance/exit will be resolved at this time final working drawings are completed. One possibility, agreed to by the architect, would be to reverse the in/out ramps from level 143 to level 147, and move the "in-ramps" from entrance 143 to resident level 143 farther back.

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MATT I. SULLIVAN (1857-1937)
THEO. J. ROCHE (1876-1958)
HIRAM W. JOHNSON (1666-1945)

November 10, 1976

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Mr. George B. Adams
Environmental Staff, 9.1SE
U.S. Department of Housing and
Urban Development
1 Embarcadero Center
Suite 1600
San Francisco, California 94111

Re: Draft Environmental Impact Statement, Mei Lun Yuen Development Project

Dear Mr. Adams:

This office represents the owners of 840 Powell Street, property adjacent to the proposed project. This letter is in response to your invitation to submit comments on the Draft Environmental Impact Statement prepared in connection with the above-captioned project. Our comments will consist of those detailed observations made by Bolles Associates at our request and our own observations made after consultation with other persons.

We enclose herewith a copy of the report submitted to us by Bolles Associates which examines in detail certain of the more significant aspects of the project and the adverse environmental impact thereof. The report speaks for itself, and we shall not attempt to reiterate here.

In discussing alternatives to the redevelopment of the project site without HUD assistance, the environmental impact statement assumes that alternative development proposals for a commercial/hotel configuration on the project site may well exceed substantially the height and bulk of the proposed project itself [III-2].

This assumption is unwarranted. The project site is included within an area subject to a pending application for zoning reclassification with respect to height limitations. In addition, the project site is within an area which has been reclassified as RM-4, pursuant to the Residential Zoning Study recently undertaken by the Department of City Planning. Both the application for reclassification and the Residential Zoning Study call for height restrictions of 40 feet for new construction in this area.

We draw your attention to Section 302(e) of the San Francisco City Planning Code which provides that:

> "No application for a building permit on any property or for any other permit or license for a new use on any property, filed subsequent to the day that an application has been filed or a resolution of intention has been adopted for reclassification of such property... shall be approved by the Department of City Planning. While proceedings are pending on such reclassification... unless the construction and the use proposed under that permit or license would conform to the existing classification of such property...and also to the different classification...under consideration of those proceedings...".

New construction on the redevelopment project site would, therefore, be limited to substantially less height and bulk than that called for by the Mei Lun Yuen project. Consequently, the conclusions contained in the discussion of the "No HUD Assistance - Commercial/ Hotel Development" alternative are entirely incorrect.

Further, the redevelopment project itself is not exempted from the restrictions of the provisions of Section 302(e) since such exemption would be contrary to the express provisions of both the San Francisco Charter, the San Francisco Planning Code and the San Francisco Building Code.

The environmental impact statement makes no reference to the height restrictions imposed either by the Residential Zoning Study or by the application for reclassification. The EIS, therefore, incorrectly assumes that the project can be built as proposed under the existing and applicable zoning restrictions. Insofar as the consideration of any alternative to the project as designed is based on this assumption, such consideration must necessarily be invalid.

The environmental impact statement contemplates excavation of rock from the project site by heavy ripping and backhoe equipment, supplemented by localized blasting [II-61]. There is, however, no mention made whatever of the potential for adverse environmental impact of localized blasting. Further, there is no indication of what impact localized blasting would have on the adjacent properties. It should be pointed out that the redevelopment project site is a compacted site and any activity on the project site will necessarily be engaged in in close proximity to adjacent properties. Therefore, the impact of excavation by localized blasting constitutes a serious potential for adverse affect on adjacent properties and requires a much more thorough discussion than that contained in the EIS.

The EIS recognizes that ground water will be a problem on the project site [II-61]. The EIS calls for careful control of ground water and a special foundation design to prevent seepage along bedding plains. It is evident that any special foundation designs and control measures designed to reduce ground water problems will be designed to "waterproof" the project site. There is no mention made in the EIS as to three significant environmental effects of such measures. First, the measures proposed will have an irreversible effect on the water table of the project site. There is no discussion of this impact in the EIS. Second, it is quite possible that the "waterproofing" of the project site will have the effect of damming the down hill flow of ground water and the creation of a ground water reservoir of sorts underneath the adjacent properties to the uphill side. The EIS makes no mention of this potentially adverse environmental impact. Finally, the geologic cross-section [II-60] indicates that there are planes of subsurface rock. Alteration of the water table and ground water flow for the project site could have the effect of creating "slip planes" of sheared subsurface materials. The back-up of the ground water could cause water to flow into the sheared graywacke and shale and create a potential for foundation slippage, not only for the project site, but also for the adjoining properties. This potentially adverse environmental impact of the project is not discussed in any detail in the EIS.

The environmental impact statement contains no reference whatever to the adverse impact of the actual construction of the project. First, access to the project site can only be by two extremely narrow rights of way: Joice Street, with a width of approximately 12 feet; Sacramento Street, which is an extremely busy, one-way, narrow street. Further, because of the physical and geographical restraints inherent in the project site, all construction activity will be carried on in extremely closs proximity to surrounding property owners. It is not unusual for a construction project of this magnitude to require two years for completion.

Environmental impact statement contains no discussion of the size and nature of the construction equipment to be used both to excavate the site for the five subterranean levels of commercial parking and to construct the high rise residential tower. The excavation for commercial parking facilities alone will require substantial heavy equipment. There is, however, no mention made of the access to or egress from the construction site for any such heavy equipment. Nor is there any discussion of the size or frequency of passage of any of the equipment required to haul the excavated material away. There is, also, no discussion in the EIS of the building crane required for construction of the high rise residential tower or whether the building crane will encroach upon any adjacent property during its use.

Finally, the environmental impact statement calls for the implementation of a tie-back anchor system for construction of the foundation. There is no indication in the environmental impact statement as to where the tie-back anchors are to be placed. Further, there is no indication as to how far back the shafts for the tie-back anchors must be drilled or whether such drilling will encroach upon the subsurface of any adjoining property owner. There is, also, no discussion in the environmental impact statement as to the potential hazards or damage to foundations of adjacent properties posed by tie-back anchor construction.

The project, as proposed, violates the Building and Fire Code. The broad face of the residential tower is alongside Joice Street which is only 17-1/2 feet wide. The west face of the tower is set back 3-1/2 feet, giving a clearance of 21 feet to the far side of the street, and about 12 feet 3 inches to the centerline of the street. As a consequence, all openings on Joice Street would be required to be fire protected. The Sacramento Street hill, and the narrow width of Joice Street will cause problems in Fire Department access. No mention of these problems is made in the EIS.

It is evident from a thorough reading of the environmental impact statement that the project attempts to achieve too many goals within a project site which has too many physical and geographical restraints. No one goal or objective can be achieved without calling for significant sacrifices in efforts to achieve other objectives. This sacrifice is dramatically illustrated by the fact that the instant project is ostensibly a housing project designed to provide low and moderate priced housing for families and elderly persons. The design of the project ought, therefore, to be dictated by housing considerations. This is not the case here. In this project, the commercial requirements have become the dominent force and have dictated the design of the housing portion of the project. Further, a great many of the adverse environmental impacts which cannot be mitigated to a satisfactory level are directly attributable to the commercial parking facilities. It is evident that elimination of the commercial parking facilities would enable utilization of entirely new design concepts for housing for the project site which would more closely conform to the San Francisco Master Plan and which would meet the housing needs of its residents much more satisfactorily. In addition, the elimination of the commercial parking facilities would enable the project to conform to existing zoning restrictions as to height and bulk.

The environmental impact statement contains many specific measures which are designed to reduce the adverse environmental impact of the project. There is, however, virtually no guarantee that any of these mitigating measures will, in fact, be carried out. On behalf of our clients who are adjoining land owners, we would appreciate your advising us as to what safeguards there are to insure that the developer of the project will in good faith implement the mitigating measures referred to in the environmental impact statement.

In view of the substantial number of significant environmental issues omitted from discussion in the Draft Environmental Impact Statement, and in view of the great number of persons who will be aggrieved by failure to adequately review these issues, we strongly request that public hearings be held to allow for broader and more detailed examining of the environmental impacts of the proposed project.

Sincerely yours,

SULLIVAN, ROCHE & JOHNSON

By Geoffrey Gaidos
Geoffrey F. Gaidos

GFG/jap
Enclosure

Response to Comments Received From
Geoffrey F. Gaidos, Attorney at Law, of
Sullivan, Roche and Johnson

Page 2 and Paragraphs 1 and 2 of Page 3

The statement on Page III-2 has been deleted from the Final EIS. However your statement that the site lies within an area that has been reclassified RM-4 pursuant to the recent Residential Zoning Study being conducted by the Department of City Planning is in error. It has been formally proposed for reclassification as a PR (Planned Residential) District. This proposed reclassification action took place on October 28, 1976. Under this classification, the Redevelopment Plan would provide all zoning regulations which, of course, would allow the 160-foot tower.

The Redevelopment Plan has been approved by the Board of Supervisors and is in conformity with San Francisco's Master Plan. The City's Zoning Ordinance (City Planning Code) shows the site to be currently zoned R-5 and C-3-G which would allow the 160-foot tower.

It is true that the San Francisco Planning Code would prohibit the issuance of a building permit for any development in excess of 88 feet - the most restrictive height of the application for zoning reclassification for one year from the date the application was submitted (February 1976). However, it is the Planning Commission's belief that the height limit issue should be resolved prior to the expiration of this holding action and it has been calendered for the second week of January 1977. HUD believes that the Planning Commission and the Board of Supervisors will choose to honor the Cooperation Agreement between the City and County of San Francisco and the San Francisco Redevelopment Agency wherein the City agreed to "make any necessary changes in zoning use districts within the Project so as to conform to the land use and development standards provided in the Plan." (A copy of the Resolution and Cooperation Agreement follows the Project Description in Part I of the Final EIS which has been expanded for purposes of clarity.)

In any event, HUD's decision whether or not to approve the Project as proposed must be made prior to the sponsor's preparation of the final plans and their submission to the City. Thus, it is necessary that this EIS be prepared and circulated at this time so that HUD may make a fully informed decision as required by Federal statute.

Page 3, Paragraph 3

No blasting is anticipated. Blasting, if required, is subject to special review and approval for size and number of charges, placement on the site and times for setting them off, by the Director of Public Works. Thus any adverse impacts will be minimized to the fullest extent possible. Again, however, no blasting is anticipated.

Page 4

The soils report referred to in the EIS was not the normal report which HUD requires of projects it approves for Mortgage Insurance; no such report has as yet been completed since this Project is not as yet in the submittal stage. If HUD should decide to approve the Project for Mortgage Insurance, then a full soils report will be requested. At the time it is requested, HUD will require that the report also contain a geological report and a foundation investigation. This report will also be asked to address the specific question of ground water, which must be resolved before HUD insures the mortgage.

Page 5, Paragraphs 1 and 2

The text on page II-3, paragraph 7 has been expanded to include a full discussion of the anticipated short-term construction impacts and their mitigation.

Page 5, Last Paragraph and Top of Page 6

The tie-back anchor system, if used, is not expected to encroach on adjoining properties. (Encroachment on adjoining properties could not take place without the approval of the owners of these properties.) HUD is aware of the potential adverse impacts involved in the use of a tie-back anchor system and will require that special geological studies be made to assess these impacts should this system be proposed. However, it is not expected that this system will be used in the construction of the tower.

Page 6, Paragraph 2

The project as proposed does not violate the building and fire code. The broad face of the residential tower is alongside Joice Street which is 17.50 feet wide. The west face of the tower is set back 11.50 feet, giving a clearance of 29.00 feet to the far side of the street, and actually 20.00 feet to the center line of the street. The efficiency unit on the corner of Sacramento and Joice Streets projects approximately 7.00 feet beyond the remainder of the tower and therefore that particular portion of the building is 4.50 feet from Joice Street. Note that the property line is to the west of Joice Street as verified by Mr. Alex Corenevsky, Senior Plan Checker of the Department of Public Works. The schematic plans have been presented to the San Francisco Fire Department and clearance has been obtained. This is discussed on page II-52.

Bottom of Page 6, Top of Page 7

This comment presents the spurious argument that commercial requirements have become the dominent force and have dictated the design of Mei Lun Yuen. When the pressures from Chinatown for housing for the elderly became strong enough the San Francisco Redevelopment Authority made an exhaustive search for a location in or near Chinatown which would meet all of the requirements for an urban renewal project. After selection of the site, the primary question was how to maximize the use of the site so as to provide the MAXIMUM NUMBER OF HOUSING UNITS on the site. Because of the cuts made during the rebuilding after the 1906 fire and earthquake it was at once apparent that a platform of some type would be needed to support the several buildings desired for family-type housing units (the elderly units would be in a tower). The same platform would also provide open space or plaza area shielded from the traffic noise of the surrounding streets (especially Stockton Street) by being raised somewhat above the street. The concept of the platform was conceived by the San Francisco Redevelopment Agency and the details were worked out in cooperation with the San Francisco Planning Department. Again, its primary purpose was to support additional housing structures slated for low-income family housing (which would be inappropriate for a tower structure), and to provide open plaza type space away from the urban noises in the area.

As the platform concept was developed it became apparent that there could be no plaza or open space area without the platform because of the cuts and steepness of the hill, nor would there be a way to raise the family structures away from the concentrated traffic noise, especially on Stockton Street. It was the only way to provide non-elevator housing for families -- a requirement HUD greatly supports from its years of experience in the field. In addition the platform would assure those family-units sited upon it would not have to face a hard dirt bank, but rather be situated so as to have a view and availability for light and air on the west.

As the realization became firm that a platform was needed to provide a workable Project in terms of maximum number of units and all the additional amenities such as open space/plaza and lessening of traffic noise the concern arose as to how this expensive platform might be financed. The money was not available in the Urban Renewal Plan nor within the Section 236 Statutory Limits for such a platform and the number of demands being made on the City's Federal Revenue Sharing monies far exceeded the amount available.

It was recognized that parking would be needed for the Project tenants - parking that could be provided under the platform. Additonal parking was needed in the area and by providing for a commercial parking garage a developer was found who would develop the commercial parking garage with a platform which would support the additional housing units. The success of the garage would be the concern of the developer and not the Project for there was no connection - financially - between the two parts of the Project other than the provision of the platform as part of the overall development of the garage.

Thus it can be seen that it was the desire to provide more housing than the site - in its original state - would allow which originated the concept of a platform. Furthermore, it was the search for funds to finance the platform which gave birth to the concept of a commercial parking garage which would provide the platform and some of the parking needed for the Project in return for a commercial operation whose success or lack of same would in no way affect the residential portion of the Project.

In other words, it was the search for a means of providing the maximum number of housing units at the least cost to the Project which dictated the design NOT THE DESIRE FOR COMMERCIAL USES whose operation would benefit no one but the developer. The commercial retail space (10,000 - 15,000 square feet) will be allocated only to the space that is left after all of the other needs of the Residential portion of the Project are met, including community meeting rooms. So, in this instance also, it is the housing needs that will dictate the commercial space.

Page 7, Paragraph 2

The various mitigating measures required by HUD throughout the EIS must be included in the final construction drawings prior to HUD's approval. At the time of their submission to HUD for such approval, the inclusion of the various mitigating measures will be verified.

Page 8

HUD met with representatives of the 840 Powell Homeowners Association before an environmental clearance was prepared on the Redevelopment Plan for Chinatown. At that time the Association expressed objections based on the fact that the design of the project might obstruct their views, adversely impact their property and not provide the best housing opportunities for residents of Chinatown. HUD considered these questions and they later formed a substantial part of the basis for the Department's decision to prepare a full EIS on the Mei Lun Yuen housing project.

Before the EIS was prepared, HUD met again with the 840 Powell Homeowners Association, primarily to discuss the design concerns. The Association representatives had full access to all HUD project files and received copies of documents upon request. The Association was invited to prepare an alternative design proposal, and did submit to HUD a narrative containing some alternative design concepts which HUD utilized in preparing the Draft EIS.

The Department has received copies of the Association's letters to the City Planning Department and Redevelopment Agency. Further, there have been many informal conversations between representatives of the Association and HUD.

Now we have received and responded to comments of the Association on the Draft EIS.

All of the Associations comments have been carefully considered and discussed by HUD and many alternative locations and designs for the tower have been analyzed.

HUD has also met throughout its processing with the Planning Department, the Redevelopment Agency, the non-profit sponsor, the Presbyterian Church, interested Chinatown residents and other public and private groups, federal, state and local. In addition HUD has received over 1800 comments from interested citizens.

If HUD were to hold public hearings on this project, the purpose would be to determine the nature of the concerns of parties expressing an interest in the project. Since the 840 Powell Association and others have been discussing their views on this project with HUD for over two years, as well as having the opportunity to present prepared written comments on the Draft EIS, the Department does not feel that a public hearing would provide any substantially new information that would be helpful to HUD in making its decision on the project. Therefore, HUD has considered all written and oral comments received on the project and will not hold a public hearing on the matter.

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SFAO

BOLLES ASSOCIATES
Architects · Planners · Since 1905
14 Gold Street · Jackson Square
San Francisco · California 94133
415-392-4919

MEMORANDUM
76-18
November 1, 1976

To: G. F. Gaidos

From: Erwin Williams

Re: MEI LUN YUEN DEVELOPMENT PROPOSAL

At your request, we have reviewed the Environmental Impact Statement (EIS) prepared by HUD for the Mei Lun Yuen parking and housing project proposed for development on property located at the southwest corner of Sacramento and Stockton Streets. The site is approximately one acre in size, and was assembled, cleared, and offered for sale by the San Francisco Redevelopment Agency.

In conducting our review, we have examined the following architectural drawings which were prepared by Architects Associated, 300 Montgomery Street, San Francisco, CA.

Drawing A-2:	Site Plan	dated August 29, 1975
Drawing A-3:	Sections	dated August 29, 1975
Drawing A-4:	Elevations	dated August 29, 1975
Drawing A-8:	Garage & Commercial Plan	dated August 29, 1975
Drawing A-9:	Garage & Commercial Plan	dated August 29, 1975
Drawing A-10:	Garage Plan	dated August 29, 1975

To obtain further background information about this project, we also reviewed three elements of the information package provided to potential development sponsors by the Redevelopment Agency in 1973. Those elements are:

1.	Invitation for Development Proposals	undated
2.	Information for Development	undated
3.	Statement on Architectural Design Review	undated

Based upon our review, we would make two kinds of comments regarding this project and the EIS: general comments relating to broad questions and concerns, and specific comments relating to particular aspects of the proposed development program and the EIS.

GENERAL COMMENTS

1. The proposed development program attempts to achieve a great number of diverse objectives on a site that is relatively small and also is constrained severely by physical conditions around it (including, for example, steep topography, limited accessibility and street capacity, and existing development). Our experience with development programs of a similar nature indicates that it is extremely difficult to achieve complex program objectives and also mitigate effectively any adverse environmental impacts.

For example, our office has been working for several years on the design of a regional shopping center located in a downtown redevelopment area. Numerous schematic design alternatives have been developed in an effort to achieve the diverse objectives of the community, the developer, potential tenants, and state and federal agencies. A plan satisfactory to all parties has yet to be found, and the only feasible direction appears to lie in reducing certain program requirements.

2. A review of the Redevelopment Agency's documents indicates that the primary public objective for this site is to provide low and moderate-priced housing. However, the development program predicates, and the EIS concurs, that such housing can be economically feasible only if a commercial parking garage is constructed in order to provide the "land" and foundations for the housing portion of the development.

3. It is our judgment that nearly all of the serious adverse impacts upon the site environs are generated by the inclusion of a commercial parking garage in the development program. For example, traffic congestion and significant emissions of carbon monoxide, nitrogen oxide, and particulates are problems caused directly by the commercial parking garage. Mitigation of those problems probably will increase design requirements and construction costs for the housing portion of the development program, thereby reducing the value of the parking garage's contribution to the land and foundation costs of the housing.

4. Similarly, it is our judgment that the limitations imposed by existing physical conditions on and around the site could be adequately accommodated if a commercial parking garage were not included as part of the development program. For example, operational requirements for parking garages, and construction cost factors for apartment towers, have dictated the proposed project design. Deletion of the parking garage would permit the housing program to achieve the dominant role in shaping a design solution. The last sections of this memorandum discuss Alternative Design Programs more specifically.

5. It is our conclusion that the EIS does not demonstrate completely and adequately that the extra project costs and the costs of adverse impacts, which are attributable to a commercial parking garage, are less than the cost benefit provided to the housing development by a commercial parking garage.

6. Investigation of alternatives has been limited to shifting the various housing components to different locations on top of the parking garage. Eliminating the commercial parking garage from the development program has been explored only in terms of the financial impact upon the land cost portion of the entire urban renewal project. No attempt has been made to assess the overall net costs and benefits attributable to an alternative program featuring only housing and retail commercial uses.

SPECIFIC COMMENTS

Based upon the present design drawings, we have some concerns that the operational characteristics of the commercial parking garage could cause adverse impacts upon peak hour traffic flow on Sacramento Street, and that those impacts could be more serious than is indicated in the EIS.

Our concern is predicated upon the present characteristics of Sacramento Street and certain features of the project design, including:

1. A narrow pavement width of 29 feet curb-to-curb.
2. Heavy bus traffic (No. 55 line) during the evening peak hour.
3. A steep grade (18 percent upgrade).
4. A street capacity of about 600 vehicles per hour (per EIS, p. II-5).
5. An existing peak hour traffic volume of 561 vehicles.
6. The necessity for all cars (resident and non-resident) to exit from the project onto Sacramento Street.
7. An estimated peak hour traffic volume, including project-generated traffic, of 803 vehicles (134 percent of street capacity), causing a back-up of traffic on Sacramento and Stockton streets.

Our observation is that several design features of both the resident and commercial parking garages may create additional back-up of vehicles onto Sacramento Street, causing:

1. Increased traffic congestion during the peak hour.
2. Increased headway on the Muni No. 55 line causing buses to run behind schedule, with consequent vehicular overloading, longer passenger travel times, and passenger discomfort due to overcrowding.
3. Increased air and noise pollution generated by vehicles idling in stalled traffic.

The following comments, and the attached diagram, address specifically our concerns about design features of the parking facilities.

Internal Traffic Flow and Parking Systems

The Garage Plan for Levels 143 and 147, as shown on Drawing A-8, indicates a capacity count of 58 commercial parking spaces. However, only 55 commercial parking spaces actually are delineated on the drawing itself (25 spaces on Level 143, and 30 spaces on Level 147). A count of 58 spaces is needed to achieve the stated total parking capacity of 216 spaces for public (non-resident) parking. This means that 3 cars must be parked in areas not shown on this drawing as parking stalls. The only areas available for such parking are located on either side of the entry/exit driveway on Sacramento Street. Parking and vehicle maneuvering at those points will create hazardous internal garage circulation; more importantly, they may restrict the entry and exit flow of traffic and cause back-up onto Sacramento Street.

Entry and Exit Movements

The pattern of entry and exit movements on Sacramento Street for public parking is the reverse of a normal left-hand/right-hand condition. The pattern is a logical response to the one-way flow of traffic on Sacramento Street. However, this special pattern requires a transition to the typical left-hand/right-hand pattern of traffic flow at some point within the garage. The garage ramps which will be used by all cars leaving the public garage and Level 143 of the resident garage are located only about 60 - 70 feet from the point at which fare collection will be made. This will permit a back-up of only 3-4 vehicles at the exit point, and such a back-up can be expected to occur during the evening peak hour. By itself, that back-up will affect only the users of the garage itself, and would be of concern only to the garage operator.

However, a back-up of vehicles onto the internal ramp structure will impede the flow of traffic entering the garage; that impedence will be especially difficult to handle because of the necessity for entering vehicles to make a transition from the left traffic lane to the right traffic lane after they enter the garage. The net result is that vehicle entry during the evening peak period will be difficult and slow, and could cause entry back-up to extend onto Sacramento Street.

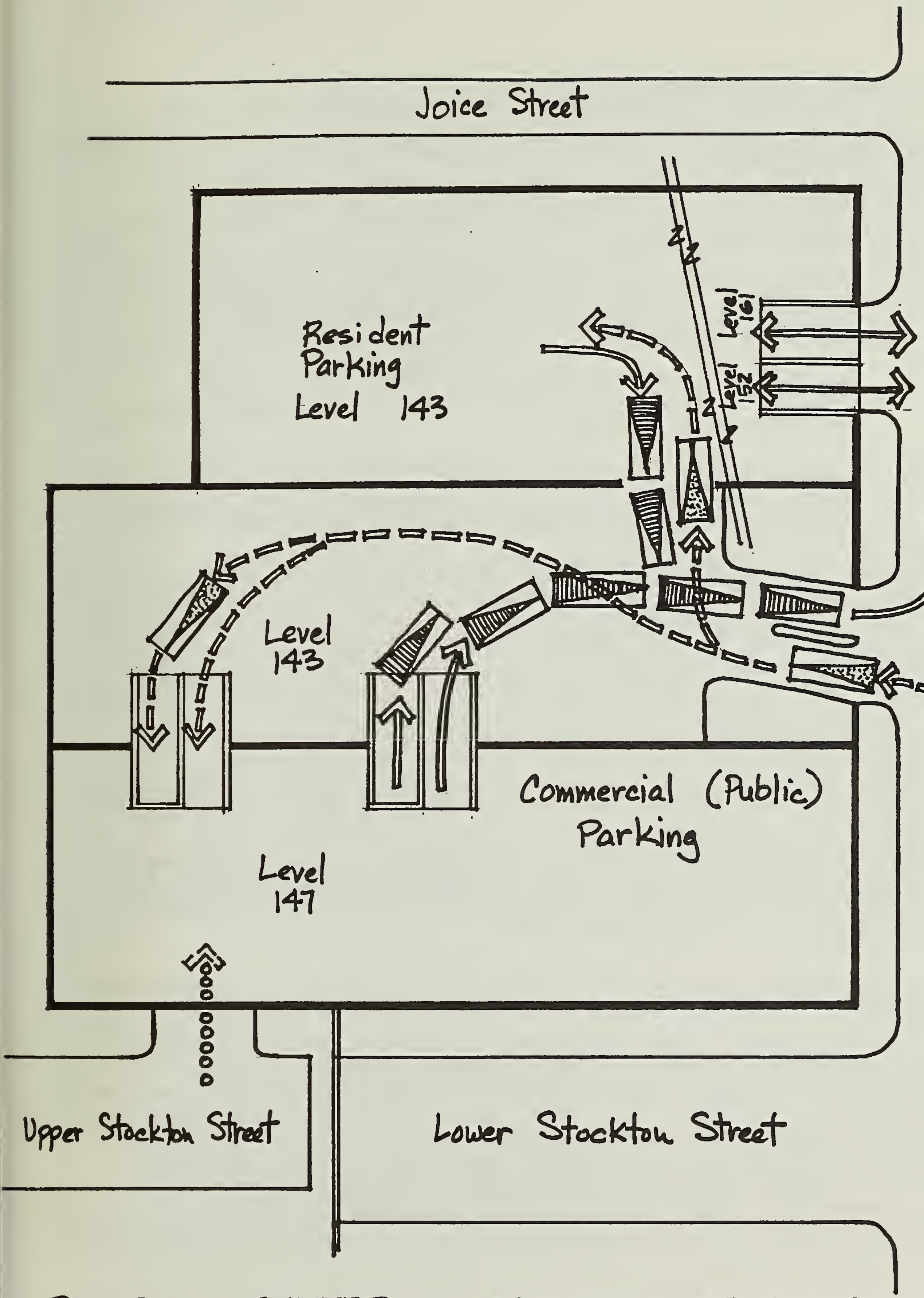
Joice Street
Resident Parking
Level 143
Level 161
Level 152
Level 143
Sacramento Street
Commercial (Public) Parking
Level 147
Upper Stockton Street
Lower Stockton Street

DIAGRAM OF INTERNAL TRAFFIC MOVEMENTS
MEI LUN YUEN REDEVELOPMENT PROPOSAL

Ramp Systems for Resident Parking Beneath Tower

A total of 55 spaces are allotted for parking by residents of the housing development:

1. Seven (7) spaces beneath Building "D", with access from Joice Street.
2. Fifteen (15) spaces beneath the tower building at Level 161, with entry/exit via a single ramp at Sacramento Street.
3. Eight (8) spaces beneath the tower building at Level 152 with entry/exit via a second single ramp at Sacramento Street.
4. Twenty-five (25) spaces beneath the tower building at Level 143, with entry/exit through the public garage and via the public garage ramps at Sacramento Street.

It is not a normal practice to design a parking garage to which both entry and exit access is provided by only a single ramp. Such a practice creates hazardous conditions because sight-lines within a structure do not permit adequate visual identification of entering and exiting vehicles; such hazards achieve greater importance when they impact streets which already are congested.

It is conceivable that a single-ramp garage system might work if garage capacity is very small, such as the 8-car and 15-car capacities indicated for Levels 152 and 161, respectively. However, it must be admitted that there exists a good probability that vehicles occasionally will attempt to enter and exit at the same time during the evening peak hour. It reasonably can be expected, therefore, that the resultant ramp congestion at times could cause additional back-up and congestion on Sacramento Street during the evening peak hour.

Parking Rate Structure

The EIS acknowledges that operation of the commercial parking garage could cause serious congestion on Sacramento Street during the evening peak hour. As a mitigating measure, the EIS recommends establishment of a rate structure that would discourage long-term parkers and reduce the project-generated traffic by about 100 vehicles. Nevertheless, the total peak hour traffic volume on Sacramento Street would increase from 94 percent to 117 percent of street capacity. Thus, even with the recommended rate structure, the project would cause Sacramento Street to achieve an overloaded condition.

While the recommended rate structure may be successful in theory, the EIS does not demonstrate that it is achievable in actual practice. Ultimately, the success of the parking garage lies with its ability to attract a certain number of long-term parkers. It is our judgment that, given the nature of surrounding activities, there may not be a demand for short-term parking sufficient to replace the long-term parking needed to make the commercial parking garage an economically-viable operation. Since no market studies for short-term and long-term parking demand have been presented, the EIS makes an unsubstantiated assumption that a revised parking rate structure would, in fact, reduce peak hour traffic volume on Sacramento Street.

Data Inconsistency

Entry to the commercial parking garage would occur at two points: from Sacramento Street, and from Upper Stockton Street. The EIS is inconsistent in presenting the projected distribution of entry movements among the two entrances. On Page II-5, the EIS states that "...perhaps 50% of the in-space vehicles will use Upper Stockton Street, and the other 50% Sacramento Street." However, Page II-13 states that "There is also an entry to the parking structure on Upper Stockton Street; however, traffic into the parking structure at this point is expected to be relatively small compared to traffic at the Sacramento Street entrances /exits." The EIS does not indicate which distribution assumption was used in projecting traffic volumes on Sacramento Street.

SAN FRANCISCO URBAN DESIGN PLAN

The EIS states that the proposed project design is in conformance with the San Francisco Master Plan. While the project appears to satisfy height and bulk regulations, the proposed housing tower is not necessarily in accord with the intent of the Urban Design Plan.

For example, in a section entitled "Fundamental Principles for Major New Development," the Urban Design Plan includes the following statements::

1. Tall, slender buildings near the crown of a hill emphasize the form of the hill and preserve views.
2. Low, smaller-scale buildings on the slopes of hills, at their base and in the valleys between complement topographic form and permit uninterrupted views.

3. Tall buildings on the tops of hills allow clear views down streets.

4. Tall buildings on slopes of hills severely restrict views from above.

Based upon those principles, the plan incorporates this design policy: "Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development." The intent of that policy, as described in the plan, is to preserve topography and views by locating tall buildings at the tops of hills, and buildings of smaller scale on the slopes and at the bases of hills. Since the Mei Lun Yuen tower is located on the slope of the hill and blocks views from adjacent apartments, the proposed design does not seem to be consistent with the master plan policy described above.

ALTERNATIVE DESIGN PROGRAMS

The attached table describes the development program for the Mei Lun Yuen project, as presented by Architects Associated on Drawing A-1. The table indicates that about two-thirds of the development program is directed at providing housing, while about one-third of the program is directed at providing commercial parking. Since the site area is approximately 45,300 square feet, the proposed development program generates a floor area ratio of 6.5 to 1 (the ratio of the gross floor area of all buildings on the site to the land area of the site). It is our opinion that the density of the proposed development prevents adequate mitigation of development impacts.

The commercial parking garage will cause overloading of Sacramento Street during the evening peak hour, and will increase levels of noise and air pollution. Deletion of commercial parking from the development program would eliminate those adverse impacts.

More importantly, perhaps, elimination of the commercial parking garage would result in a reduced floor area ratio of 4.5 to 1. This would permit a better response to the steep topography of the site, would be in accord with limited vehicular access conditions and street capacities, and would preserve the light, air and views available to both project development and adjacent properties.

For example, the EIS indicates that the apartment tower is located at the upper end of the site because construction would be too expensive at any location above the parking garage. However, the proposed tower location would cast shadows upon the public plaza and sidewalks during much of the day, would block

DEVELOPMENT PROGRAM FOR MEI LUN YUEN PROJECT

HOUSING		137,976 SF	46.9%
High-rise tower (elderly)	96,363 SF		
Low-rise frame (family)	41,613		
PUBLIC AREAS		30,726	10.4
Indoor commons	7,975 SF		
Open landscape	19,451		
Roof garden (tower)	3,300		
PRIVATE PARKING (55 cars)		24,742	8.4
COMMERCIAL		10,416	3.6
SUB-TOTAL		203,860 SF	69.3%
PUBLIC COMMERCIAL PARKING (216 cars)		90,264	30.7
TOTAL PROGRAM AREA		294,124 SF	100.0%

views from adjacent housing, would create a dark canyon along Joice Street, and would require vehicular access to occur on Sacramento Street.

Also, the proposed tower is poorly-located for convenient pedestrian access by elderly, infirm, or handicapped residents; to reach the tower's elevator lobby from Stockton Street, people would need to negotiate an 18 percent grade up Sacramento Street. It should be noted that design standards, for facilities used by elderly and handicapped people, permit a maximum slope of 8 percent.

If the commercial parking garage is deleted from the program, it would then be possible to place a tower in a location where it would be conveniently-accessible from the lower elevation of the site, would increase the light and air available to project development and public spaces, would maintain open views from adjacent apartments, and could be constructed without using the more-expensive ductile framing system. Family housing and private (resident) parking for 55 vehicles could be redistributed about the site in a favorable manner. Parking access could be limited to Upper Stockton Street, connecting to California Street where capacity during the evening peak hour is under-utilized.

SUMMARY

The primary public objective of the redevelopment program for this site is to provide low and moderate-priced housing for families and elderly persons. To improve the economic feasibility of the housing, the program was expanded to include a commercial parking garage.

However, because of its particular needs, the commercial parking garage is the dominant force in shaping the proposed design, and it generates impacts undesirable for both the immediate neighborhood and the prospective tenants of the housing. Deletion of the commercial parking garage would eliminate most of the serious adverse impacts associated with this development program, and would permit the housing program to dominate project design.

From a broader viewpoint, deletion of the commercial parking garage would permit a fresh approach to design on this site. Indeed, it then would be possible to explore the feasibility of a terraced housing scheme which would respond to site topography and which could incorporate roof-top gardens and a diversity of public and private open spaces, and could improve the integration of project elements with each other and with surrounding development. Such a scheme would seem to be especially appropriate for this particular site.

Response to comments from Erwin Williams of Bolles Associates to C. F. Gaidos of Sullivan, Roche and Johnson

General Comments

1. It is understood that a development such as this will involve complex program objectives and will require mitigation to alleviate adverse environmental impacts. However, HUD believes that through the efforts of the sponsor, the architects and others involved in the design of Mei Lun Yuen as well as the preparation and circulation of this Environmental Impact Statement, not only have the major program objectives been reached, but also the few adverse environmental impacts have been reasonably mitigated.

2. As noted in the response to Sullivan, Roche and Johnson, the successful operation of the parking garage in no way affects the financial feasibility of the residential portion of the Project. It does provide - via private financing - the platform for the plaza and for some of the low-rise residential buildings. No money was or is available to the Redevelopment Agency to provide public financing of this platform.

3. As indicated in responses to other comments and in the corrected text of the EIS, the capacities of the surrounding streets are more than adequate to handle the additional traffic generated by the Project. All air impactions caused by the Project are within Federal standards and the costs of the mitigating requirements are not expected to be severe.

4. Construction of the tower is not related to the commercial parking garage. The garage provides the platform for but 3 of the four family unit buildings plus the plaza common area.

5. The commercial garage is being privately financed. It's construction and operation are not expected to produce any adverse impacts which would require expensive mitigating actions. Thus the provision of a platform for the housing at no cost to the Project, provides a clear financial benefit and very little off setting mitigation costs.

6. The parking garage is necessary for the erection of the platform. upon which a portion of the housing is to be built. Informal discussion with the San Francisco Redevelopment Agency and the San Francisco Planning Department indicates that the flatform is indeed essential to the development. The existing cut in the hill was made during the rebuilding following the San Francisco earthquake and fire; the platform will allow greater utilization of the site.

Specific Comments

Paragraph 2, Item 7

The added peak hour capacity of Sacramento Street, resulting from towaway zones being in effect eliminates the problems mentioned. See Circulation/Transportation Section (page II-4) for a full discussion of the fact that Sacramento Street will not be used beyond its capacity.

Paragraph 3, Item 2

See discussion on public transportation, page II-8 regarding capabilities of the Muni System. In addition, during peak hours when towaway zones are in effect, one lane is used primarily by the busses. (See comments from San Francisco Department of Public Works dated 11-9-76 item 3).

Page 4, Paragraph 1

These comments are accurate, but are taken from preliminary plans. Final plans will have the parking spaces accurately delineated, and will reflect the actual number of stalls. There is no requirement to provide 216 of them.

Page 4, Paragraphs 2 and 3

HUD agrees with this comment. The conflicting crossovers necessary so close to the Sacramento entrance/exit will be resolved before HUD insures the mortgage. One possibility, agreed to by the architect, would be to reverse the in/out ramps from level 143 to level 147, and move the "in-ramp" from Entrance Level to 143 to Resident Level 143 further back.

Page 6 Top

The architectural plans are only preliminary at this time, and will be changed before HUD insures the mortgage to correct the single ramp design. Two possibilities are being looked at: 1) widening the ramp by reducing the storage and lounge spaces on either side, and 2) the installation of a buzzer system giving priority to entering vehicles.

Page 6, Bottom and top of Page 7

The added peak hour capacity of Sacramento Street, resulting from towaway zones being in effect eliminates the problem.

Page 7, Paragraph 2

The proper figure is that of Page II-8, 50% or 84 vehicles during the peak hour. The EIS has been corrected to reflect this.

Page 7m Bottom and Top of Page 8

The Mei Lun Yuen Project tower as proposed by Architects Associated is not at the crown of the hill but on the slope of the hill. The crown of the hill is not located in the Project Area. However, the Project is substantially consistent with the Urban Design Plan in that the proposed structures do step up the hill as the slope increases.

The Mei Lun Yuen Tower is lower than the structures at 840 and 850 Powell Street so the contour of the hill is preserved. The Urban Design Plan is part of the Master Plan and both the Planning Department and Board of Supervisors have approved the Plan as conforming to all aspects of the Master Plan. Although there is some view blockage, the most desirable view - that of the Bay - as expressed by the tenants to both Architects Associated and HUD, have not been eliminated for most. The design of the tower is such that it does allow the Bay view from properties on the hill.

Page 8, Paragraph 2

HUD believes that development impacts are to be adequately mitigated pursuant to this Final EIS.

Page 8, Paragraph 3

The added peak hour capacity of Sacramento Street, resulting from towaway zones being in effect eliminates the problem. As noted previously, noise and air impactions with attenuation are within Federal Standards. Mitigation of air and noise impactions are addressed in the EIS.

Page 8, Paragraph 4

The garage is essential to provide the platform upon which a portion of the residential structures are situated. HUD has determined that a platform provides the most advantageous situation for construction of the housing. See reply to comments from Geoffrey F. Gaidos, Attorney at Law of Sullivan, Roche and Johnson, pages E-19-21.

Page 8, bottom, top of Page 10

A study was made of shadows cast on and off the Project Area by the Project. No major adverse impact will be created. Views from adjacent housing are only partially blocked - to the least possible measure by careful building design - and the view of the bay was preserved as much as possible. Moving the tower to other locations on the platform would result in adverse impacts as discussed in the Design section.

Page 10, Paragraph 2

Much of San Francisco is built on hills, many of which have servere grades. Although the grade here is steeper than desired, HUD does not believe it is so severe as to constitute a barrier to the development of the Project.

In order to mitigate the effect of the steepness of Sacramento Street, HUD will require three rest stops to be installed between Stockton Street and the Project boundary west of Joice Street. This will be done in consultation with the Department of City Planning and subject to City approval. Thus the elderly will not have to negotiate the entire hill at one time.

Consideration had been given to requiring a special pedestrian entrance at Stockton and Sacramento Streets with a special elevator to the Plaza level. However, the San Francisco Planning Department advised that it could serve to encourage crime against the elderly in the Project.

Page 10, Summary

This is the same comment as made in the letter of Geoffrey Gaidos. See response at pages E-19-21.

NOB HILL ASSOCIATION

12 LEROY PLACE, SAN FRANCISCO, CALIFORNIA 94109

November 10, 1976

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U. S. DEPT. HUD
ENVIRONMENTAL BRANCH
SFAO

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT
MEI LUN YUEN DEVELOPMENT OF THE CHINATOWN
REDEVELOPMENT AREA IN SAN FRANCISCO, CALIF.,
COMMENTS RELATIVE THERETO.

Dear Mr. Adams:

The Nob Hill Association wants to convey its appreciation for the opportunity of responding to and commenting on the subject draft environmental impact statement. Its Board of Directors at a regular meeting approved the contents of this letter.

The Nob Hill Association is on record as being strongly opposed to the project for which the Statement is made. As currently exhibited, it is the wrong project for the wrong location. The Draft Environmental Impact Statement only serves to confirm our belief.

Let it be said again, we are not opposed to the development of moderate priced housing, nor are we opposed to housing for the elderly; on the contrary.

It is one of the worst possible locations for the elderly, both with regard to their activity and to a suitable environment for them. Because of the physical impairment which age brings, a negative impact will thereby be caused for them and because of them. This is unfair to those elderly persons who would live here. An impact not included in the Statement.

In order to walk to and from the Project, they must walk up and down one of San Francisco's steepest streets, and to board an auto or bus they must do so from this steep slope. Even those who are only slightly crippled will find this very difficult. Those who are crippled will find it painful to impossible. To make the grade many motorists, truck and bus drivers gun the accelerator to make the grade, while cars, trucks and busses come shooting out and into the Stockton Street tunnel. This is particularly unnerving to the elderly.

The draft EIS covers well the adverse impact this location causes because of its high to unacceptable levels of internal combustion motorized vehicles already present in addition to those which the Project itself develops and imposes. These impacts are considerably more unacceptable to the elderly; the very people this public supported project is intended to aid.

All in one small area there are the concentrated emissions and sounds caused by the increased already high number of motorized vehicles, the polutant saturated exhaust issuing from the tunnel entrance and the public garage exhaust system, the higher emissions and noise levels of trucks and busses laboring up Sacramento, the booming reverberating sounds from the tunnel, and the increased in and out activity of the public garage. This is especially so when one of the Statement's mitigating recommendations is for greater emphasis on short term parking. This greater number of cars due to a short term parking recommendation will also aggravate the competition between cars and the elderly using the same sidewalk space. It is assumed that because of the site no off street-on site loading facility is provided for the elderly.

The Project first appears to be a fine location in respect to the closeness of Downtown via Stockton Street. In reality to take advantage of this desirable location, these elderly must walk through the tunnel with its known danger of crime, high noise levels and high quantities of exhaust fumes. All particularly adverse to the elderly. These people will be virtually confined to visit Downtown by means of car or bus, though it is in tantalising walking distance.

Although we are aware that this project, as well as any other, can no longer discriminate in favor of any one race, the Project as we understand it and as to which the Statement does speak, elderly Chinese are expected to be tenants. With the great veneration the Chinese have for their elderly, we ask how then can they be pleased with a site which permits so little kindness to its occupants?

Because of these same conditions and the slower walking speeds of the elderly, the Stockton-Sacramento intersection will become a constant danger to these people. They must cross this intersection as activity lies beyond, unless with great effort they walk up two blocks of steep Sacramento to the "top" of Nob Hill. By the same token, their longer time crossing the street at this unique intersection will cause traffic pile ups, and will unfairly cause venting of anger upon those holding up traffic, unfairly so.

It has been determined that this project must be located in Chinatown, on which we certainly have no objection. However since Chinatown, as appears in the Statement, is bounded by Bay, Van Ness, Bush and Sansome, an area of 885 acres, it would appear that in this vast area, a more suitable site could be found. Our knowledge, experience and intelligence causes us to reject the statement that no suitable site could be found with this area.

We find it difficult to believe that one with any knowledge and sensitivity towards the elderly would more than casually consider this site as a suitable living place for them, and only under great duress would have agreed to it.

This site is wrong for public supported and government sponsored moderate priced housing when it takes a public garage to support it, especially when a public garage serves to increase the negative impact both for the residents of the Project and community surrounding it. The Statement recommends that the garage not be used for commuters and other long term parking to mitigate the unacceptable levels of traffic, noise and emission problems at the commute hours. Since the only reason for the public garage is to make the Project financially feasible, the only way, therefore, the garage can operate is in a way which secures the highest revenue to make the Project feasible. We accordingly reject this mitigating recommendation, because financial considerations on the garage operation must be paramont, otherwise the project may fail adding another burden to the taxpayer.

This garage is located two to three steep blocks from the area where short term parkers want to go. It is suggested that the EIS resorts to theory and assumption to prove its point on the short term parking recommendation. The Brocklebank Garage on Sacramento just below Mason has more short term space than demand requires even though the parking rate is considerably lower than those garages which are only a little more accessible. We would question the use of theory when facts are so easily obtained.

Another internal negative impact was not considered in the EIS. Especially since this is public supported housing for the elderly, why then is the tower designed to virtually enforce two "classes of citizens", i.e., those whose apartments have a view and those which have none and are virtually up against other buildings making them very dark living spaces. There must be other solutions which treat the elderly with more understanding and kindness. The elderly are often forced to spend much and sometimes all of their time in their apartments. Cannot a design be achieved where views and light can be shares more equally? Is the site and its attendant high costs again the villan?

The EIS speaks of the Project's architectural aesthetics. It suggests that the building heights should be graduated from a low point at Stockton and Sacramento. This we think is excellent advice. However, the Project's current design does not do this; and does not because of the high garage and commercial platform. It is at this much higher level that the step up begins, high above the viewer's head. For those persons on the streets and sidewalks of Stockton and Sacramento, they will have only the scaleless and plane walls of the platform at which to look. An inhuman and ugly contrast to the small and human scale of the neighboring buildings and the tunnel face. The walls of San Quentin offer more. These walls have nothing to do with the housing, but, as we are advised, caused by the site and costs. We submit that the design does not meet the Urban Design Plan For The Comprehensive Plan of San Francisco.

The EIS does consider the impact of the construction period but fails to consider some of the negative impacts. In relation to dust and dirt it did mention that the demolition of existing buildings had been accomplished, but consideration for the great amount of excavation appeared not to be specifically considered. Nor did it discuss the means by which these excavated materials would be hauled away, and the number of trucks which must be lined up either on Stockton or Sacramento for the purpose. It did not discuss to what portion of these narrow streets might be reserved for the building contractors' use and for what period of time; and the impact on traffic and the people living in the neighborhood. It is not unusual in San Francisco to construct a building on a restricted site, which offers no space for construction equipment, loading and storage facilities. However the physical characteristics and traffic conditions of this site compound this problem and impose a far greater impact. These are only mentioned in Part V, and appear to be somewhat superfically analyzed. The soils information included in the Statement indicated that sandstone and shale will be encountered in the excavations. We are advised by competent authority that blasting will be required to remove this rock. The Statement appeared not to consider this impact.

With regard to the use of a tie back anchor system, the EIS did not appear to discuss the possible off site location of these anchors. Will they extend under adjacent properties, and if so does this constitute an easement? If these are easements, are the owners of these properties to be compensated? Do these owners have the right to refuse if their property would thereby be encumbered beyond that which they might desire?

The Statement states that noise levels caused by traffic will be beyond acceptable limits and recommends that suitable means be taken to reduce the transmission of sounds into the Project's living units. The Statement does not make similar recommendations for the existing buildings in the area which are affected similarly. Does not this negative impact extend to the neighboring buildings as well? Should not the Project be required to reduce the sound transmission by modifying these buildings in a like manner as for the Project buildings?

What assurance is there that the Statement's mitigating recommendations will be actually included in building contract documents and into the Project buildings and those neighboring buildings? Would you kindly advise the Association of the methods for assuring compliance.

We respectfully ask the question, can a government agency be completely objective in examining the work of another government agency? Is it ethical for a government agency to prepare an environmental impact statement of an agency with which it is so closely associated?

Very sincerely yours,

NOB HILL ASSOCIATION

By Ted Moulton

Ted Moulton
Chairman, Planning Committee

cc: Francesca Apartments

840 Powell Street Corp.

Quentin L. Kopp, President
San Francisco Board of Supervisors

HUD Response to Comments by
Ted Moulton, Chairman, Planning Committee
of the
Nob Hill Association

Page 2, Paragraph 1

Much of San Francisco is built on hills, many of which have severe grades. Although the grade here is steeper than desired, HUD does not believe it is so severe as to constitute a barrier to the development of the Project.

In order to mitigate the effect of the steepness of Sacramento Street, HUD will require three rest stops to be installed between Stockton Street and the Project boundary west of Joice Street. This will be done in consultation with the Department of City Planning and subject to City approval. Thus the elderly will not have to negotiate the entire hill at one time.

Consideration had been given to requiring a special pedestrian entrance at Stockton and Sacramento Streets with a special elevator to the plaza level. However, the San Francisco Planning Department advised against this as it could serve to encourage crime against the elderly in the Project.

Page 2, Paragraph 2 and 3

As the EIS indicates, the levels of noise and air impaction caused by the Project will be within Federal Standards. Mitigation of air and noise impactions are addressed in the EIS.

Bottom of Page 2 and Top of Page 3

This location as well as alternate locations are discussed in the EIS. HUD believes this to be a fully acceptable location based upon housing need, land availability, adequacy of services, and the ability to obtain adequate financing to produce the needed rent levels.

Page 3, Paragraph 2

The proposed Project appears to have widespread support in the Chinese Community as evidenced by the receipt of nearly 1800 favorable responses from agencies and individuals in that community. Many of these were signed by several individuals.

Page 3, Paragraph 3

The traffic lights at the Stockton-Sacramento intersections are already in place to enable the many elderly living in the area to safely cross this intersection.

Page 3, Paragraph 4

Alternate site locations have been considered as noted in Part III of the EIS. HUD believes this to be a fully acceptable location based upon housing need, land availability, adequacy of services and the ability to obtain adequate financing to produce the needed rent levels.

Page 3, Paragraph 5

HUD has participated in the development of many housing projects for the elderly and from this experience finds the project location fully acceptable. This EIS will serve to ascertain whether or not the overall Project is also acceptable from an environmental point of view.

Bottom of Page 3 and Top of Page 4

As noted in HUD's response to Russell C. Pearson and Associates as well as others, the recommended rate structure has been deleted from the EIS. This should result in a more balanced ratio of long-term vs short-term parkers.

The profitability of the commercial garage is not necessary for the feasibility and operation of the residential portion of the Project.

The public parking garage serves to provide a platform upon which a portion of the residential units can be built at the plaza level.

Page 4, Paragraph 2

The recommended mitigating measure of rate control to discourage long term parkers which was articulated in the Draft EIS has been deleted in view of the effect of the towaway lanes on Sacramento Street. Since these lanes are available to traffic during rush hours, the capacity of the street is approximately 1080 vehicles (instead of 600 during the non-rush hours) during the peak hours or about 26% more than needed to adequately handle all the traffic, including that which is Project-generated. The point of short vs long term parkers raised in these comments is therefore no longer an issue.

Page 4, Paragraph 3

In virtually all apartment houses or projects, there exists varying degrees of view availability depending on location and height as well as the configuration of nearby structures. This Project has been designed to provide the best available views for the residents and the minimum blockage of the views available to nearby buildings.

Bottom of Page 4 and Top of Page 5

The excavation of the site to the general cut now existing was done shortly after the 1906 earthquake and fire. A graduated step building is not economically feasible.

The official Redevelopment Plan for the Stockton/Sacramento Approved Redevelopment Project (it's original designation) was approved by the Board of Supervisors in May, 1974, by Ordinance #250-74. It is in conformity with San Francisco's Master Plan, as was determined by the City Planning Commission under Resolution No. 7176 on April 25, 1974. The Master Plan incorporates the Urban Design Plan. Thus the Planning Commission has found the project to be in conformance with the Urban Design Plan.

Page 5, Paragraph 2

The text has been changed to include a discussion of the anticipated construction impacts as obtained from the various City departments, Bureaus and offices which will be concerned. This is found on Page II-3, paragraph seven in the Final EIS.

Page 5, Paragraph 3 and Top of Page 6

The tie-back anchor system, if used, is not expected to encroach on adjoining properties. (Encroachment on adjoining properties could not take place without the approval of the owners of these properties.) HUD is aware of the potential adverse impacts involved in the use of a tie-back anchor system and will require that special geological studies be made to assess these impacts should this system be proposed. However, it is not expected that this system will be used in the construction of the tower.

Page 6, Paragraph 2

Noise measurements included in the assessment measure existing noise levels. The Project design must mitigate this existing noise as it affects the Project; however, mitigation of existing noise as it affects existing buildings in the area is not the responsibility of the Project because the Project has not created the existing noise problems.

Page 6, Paragraph 3

The various mitigating measures required by HUD throughout the EIS must be included in the final construction drawings prior to HUD's approval. At the time of their submission to HUD for such approval the inclusion of the various mitigating measures will be verified.

Page 6, Paragraph 4

The preparation, review and circulation of the Draft and Final EIS is being accomplished under the provisions of the respective sections of the United States Code and their implementing regulations in as objective a manner as possible. HUD is not reviewing the work of another governmental agency, but rather is making an independent analysis of a project application for insurance and housing assistance submitted by a private non-profit corporation.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
100 CALIFORNIA STREET
SAN FRANCISCO, CALIFORNIA 94111

D-HUD-K89016-CA

Mr. George B. Adams
Environmental Staff, 9.1 FE
U.S. Department of Housing
and Urban Development
1 Embarcadero Center, Suite 1600
San Francisco CA 94111

NOV 12 1976

Dear Mr. Adams:

The Environmental Protection Agency has received and reviewed the Draft Environmental Impact Statement for the Mei Yuen Development of the Chinatown Redevelopment Area in San Francisco, California. EPA's comments on the draft statement have been classified LO-2. Classification and date of EPA's comments will be published in the Federal Register, in accordance with our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the consequences of the proposed actions, and the adequacy of the Environmental Impact Statement.

Table IV in the DEIS is sufficiently informative, but needs to be supported by more narrative in order to be easily understood. Existing air quality data for photochemical oxidants should be included so that the EIS contains a discussion of all the NAAQS. The FEIS should describe the background CO concentration, if any, assumed in the impact analysis and should indicate where the maximum CO impact is expected to occur. These points are important in evaluating the model results and need to be included in the air analysis.

Sincerely,

Paul De Falco, Jr.
Regional Administrator

cc: Council on Environmental Quality

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EIS CATEGORY CODES

Environmental Impact of the Action

LO--Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

Response to comments from Paul De Falco, Jr., Regional Administrator of the U. S. Environmental Protection Agency.

1. Page II-17 of Draft EIS -
   "Table IV"
   Air quality data for photochemical oxidant has been added. Footnote marked with double asterisks has been revised to provide additional explanation of Table IV ambient air quality calculation methods. Narrative on Page II-16 under "Pollutant Concentrations in Outdoor Areas" identifies the corner of Stockton and Sacramento Streets as the "critical outdoor location" which is where maximum CO impact occurs, and this impact is quantified in Table IV.

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BAY AREA AIR POLLUTION CONTROL DISTRICT

ALAMEDA COUNTY
Thomas H. Bates
Robert T Plowright

CONTRA COSTA COUNTY
Elwon Lance
James P. Kenny

MARIN COUNTY
Peter R. Arrigoni
Martin G. Blinder

NAPA COUNTY
Paul R. Gore
Sam Chapman
(Secretary)

SAN FRANCISCO COUNTY
Alfred J. Nelder
(Vice Chairperson)
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SAN MATEO COUNTY
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Daniel A. McCorquodale
William R. Jelavich
(Chairperson)

SOLANO COUNTY
James Lemos
Chester Hillyard

SONOMA COUNTY
Gerald M Poznanovich
Robert Theiller

November 10, 1976

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Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and Development
San Francisco Area
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Re: Comment on Draft Environmental Impact Statement (DEIS) - Mei Lun Yuen Development, of the Chinatown Redevelopment Area

Dear Mr. Adams:

We have reviewed the above-referenced document and submit the following comments for your consideration.

The air quality impact analysis in the DEIS is competently executed, and appears to be very complete. HUD is to be commended for adequately analyzing the air quality implications of the proposed project.

As the analysis indicates, the proposed project will result in significant levels of pollutants being generated, when garage emissions are added to background levels. Since the project involves sensitive receptors (elderly and family housing), it is very important that the design of the project provide for dispersal of garage emissions without impacting residents.

It is correctly stated on page II-19 that "Garage emissions must not be exhausted directly to Sacramento or Stockton Streets. Instead, the exhaust must be raised to a sufficient elevation above the plaza level so that the impacts on street level pedestrians and attendants at the entrances to the parking structure will be insignificant. In addition, these emissions must not impact adversely on residents of the housing units." However, the EIS does not state exactly how the adverse effect of emissions on residents will be avoided.

A design solution to this problem, ensuring that neither pedestrians nor residents will be adversely affected, should be a prerequisite for approval of this project. It appears that in order to effectively dispose of garage emissions, thus avoiding the adverse impacts discussed above, it will be necessary to exhaust garage emissions through a stack located on the roof of the highest structure, i.e. the tower, using

939 ELLIS STREET • SAN FRANCISCO, CALIFORNIA 94109 • (415) 771-6000

an adequate fan ventilating system. To exhaust garage emissions on any level below this would inevitably impact those residents living above the level of exhaust. Should this type of design solution not be effected, negative health impacts of air pollutants on project residents could result.

With regard to orientation of the buildings on the site, the location of the tower (which will have a high number of elderly residents) should be kept away from the Sacramento and Stockton intersection. This will protect the greatest number of residents, as well as the most sensitive residents, from the high pollutant concentrations which inevitably occur at such major intersections.

Please address any questions concerning these comments to Ralph Mead, Senior Planner, Technical Services Division.

Sincerely yours,

Milton Feldstein
Deputy Air Pollution Control Officer

MF:g

Response to Comments from Milton Feldstein, Deputy Air Pollution Control Officer of the Bay Area Pollution Control District.

1. Page II-19 of the Draft EIS

   "Recommended Mitigation"

   Item 1 -

   This paragraph has been revised in the Final EIS to require venting of garage exhausts at the top of the tower building.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
REGIONAL OFFICE
50 United Nations Plaza
SAN FRANCISCO, CALIFORNIA 94102

OFFICE OF
THE REGIONAL DIRECTOR

November 8, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and Urban Development
1 Embarcadero Center, Suite 1600
San Francisco, California 94111

Subject: Draft Environmental Impact Statement
Mei Lun Yuen Development of the China Town
Redevelopment Area in San Francisco, California

Dear Sir:

The above Draft Environmental Impact Statement has been reviewed in accordance with the interim procedures of the Department of Health, Education and Welfare as required by Section 102 (2) (c) of the National Environmental Policy Act, PL 91-190.

The residential portion of the proposed project will provide 175 living units of which 140 will be made available to elderly persons. We assume that the design of the building has taken into consideration the special characteristics of an elderly population and that grab-bars and handrails will be provided in hallways, stairways and in the interior living areas.

The concentration of exclusively elderly household in the Tower building may cause special needs and problems. Arrangements should be made with community groups or centers to provide some type of daily contact with these residents to give whatever assistance that may be necessary.

The opportunity to review this statement was appreciated.

Sincerely,

James D. Knochenhauer
Regional Environmental Officer

cc: OS/OEA
CEQ

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Response to comments from James D. Knochenhauer, Regional Environmental Officer, Department of Health, Education, and Welfare.

1. Construction of the elderly tower in the residential portion of the Mei Lun Yuen development must be in accordance with the Minimum Property Standards for Care-Type Housing (HUD Handbook 4920.1) including the exceptions for elderly housing listed in HUD Handbook 4900 and 4910. These standards include the several safety features noted in your letter as well as many others, which will enhance the living environment for its residents. Assurance that these features have been included will be verified during the normal course of HUD's review of the final construction plans.

2. Nearly all of the community groups and centers near the site have been active proponents of this proposed development for several years. They are all eager to render all possible assistance to the future residents of Mei Lun Yuen.

OFFICE OF EMERGENCY SERVICES
3rd FLOOR 6221 GEARY BOULEVARD
SAN FRANCISCO, CALIFORNIA 94121
668-5404

GEORGE R. MOSCONE
MAYOR

EDWARD P. JOYCE
DIRECTOR

October 20, 1976

Mr. George B. Adams
Environmental Staff, 9.1SE
U.S. Department of Housing and Urban Development
1 Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams,

This letter is in response to your Department's letter (reference 9.1SE) of September 27, 1976, concerning comments on the Draft Environmental Impact Statement for the Mei Lun Yuen Development of the Chinatown Redevelopment Area, San Francisco, CA.

I have reviewed the Draft EIS and note consideration, but in a somewhat cursory manner, has been given to the impact of a major earthquake. I can only assume the seismic standards reflected in HUD Handbook 4541.1 dated 11/1/73 were adequate at that printing, but close coordination must be effected with the Bureau of Building Inspection, City and County of San Francisco, as changes to seismic codes, I am sure, have been enacted since 1973.

From the standpoint of this office, it is highly desirable to have such a project in the location proposed which can be utilized as a potential mass care facility or fallout shelter in event of disaster. The proximity to an area of high population density, where type 5 and pre-code Type C (see "Community Safety Plan, a Proposal for Citizen Review", City and County of San Francisco, dated July, 1974) constrction abounds, and where great potential for casualties can occur, makes this project desirable. It is hoped the design architect-engineer takes advantage, during the design stage, to incorporate recognized fallout criteria in the structure. The garage and Type 1 elements of this project will allow the facility to fill a deficit in the number of facilities, in the Chinatown area, which offer this capability.

The project will be an asset to our capability in a major disaster even outside its programmed function.

Sincerely yours,

Edward Joyce

Edward P. Joyce
Director

EPJ:nkm

OFFICE OF THE MAYOR • CITY AND COUNTY OF SAN FRANCISCO

Response to comments from Edward P. Joyce, Director of the Office of Emergency Services, Office of the Mayor, City and County of San Francisco.

1. All construction in the proposed Mei Lun Yuen Development will conform to not only the HUD seismic requirements but also to the building codes of the City and County of San Francisco including all existing seismic requirements.
2. HUD encourages the provision of fallout shelters, however developers are not required to include them. Your concern is being transmitted to the developer for consideration.

ARCON, INC.
300 MONTGOMERY STREET
SAN FRANCISCO · 94104
415 · 391 · 5757

November 10, 1976

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U.S. Department of Housing & Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Attn: Mr. George B. Adams
Environmental Staff, 9.1SE

RE: 9.1SE; Draft Environmental Impact Statement
Mei Lun Yuen Development of the Chinatown
Redevelopment Area in San Francisco, California

Dear Sir:

As developer with the Presbyterian Church of subject project, please be advised that we are in favor of the HUD Draft Environmental Impact Statement dated September 27, 1976. However, we wish to comment on the following minor addendums and re-editing.

Page I-1 & II-1 - Project Description and Probable Environmental Impacts, Land Use; the retail commercial space will contain approximately 10,000 to 15,000 square feet depending on the marketing needs.

Page II-9 - Traffic & Circulation; the economics of the garage will be such that we will discourage long-term parkers (all day parkers). The "rule-of-thumb" for the economic stability of the garage is approximately 4 to 5 times turnover per 24-hour period, such as to encourage hourly parkers.

Page II-25 - Mitigation 1; see attached letter from Acoustical Engineer, specifically paragraph 1, dealing with the possibility of achieving acceptable standards of sound attenuation using design techniques obviating the need for mechanical ventilation.

Page II-27 - Mitigation 2; see attached letter for Acoustical Engineer, paragraph 3, but must also include the provision that a length along Sacramento Street of 24 feet minimum must be maintained opened and clear for emergency use by the San Francisco Fire Dept.

Page II-30 - Cultural Resources; it should be noted that the Presbyterian Church in Chinatown, the sponsor of the Mei Lun Yuen Development and the Presbyterian-related Cameron House have cooperated together for the past 100 years in providing social services and programs which respond to the specific needs of the Chinatown Community.

Page II-54 #4 - Hospitals; we understand that there has recently been an addition of an out patient clinic.

We trust that the comments made do not adversely affect your Draft Environmental Statement, but further help clarify and edify the validity of your comprehensive report.

Very truly yours,

Lyman Jee
President

LJ:mcp

cc: First Presbyterian Church
San Francisco Redevelopment Agency

architecture
engineering
the environment

Architects Associated
300 Montgomery Street
San Francisco, California 94104

5 November 1976

Attention: Mr. Marvin Buchanan

Subject: Draft Environmental Impact Statement, Mei Lun Yuen Development of the Chinatown Redevelopment Area, San Francisco, HUD-R09-EIS-1976-9D

Gentlemen:

We have reviewed the subject document prepared by the Environmental Staff of the San Francisco HUD Area Office. After this project is funded and contract documents are in the preparation stage, we will be the acoustical engineers of record. Therefore, we would like to make the following comments regarding the noise sections of the subject report.

1. Mechanical ventilation. The requirement for mechanical ventilation noted as Item 1 under "negative features," page II-24, and as Item 1 under "mitigation," page II-25, will be assessed. Additional acoustic testing, both inside and outside existing residences on Sacramento Street and Stockton Street at the elevation corresponding to the housing levels as designed in the project, will yield more precise data. Alternative means of achieving HUD interior criteria will be evaluated, including use of smaller windows, shielding the windows from the direct path of sound, etc.

2. Balcony reflections. The potential problem of sound reflection off balconies is discussed as Item 3 on page II-24 and as Item 1 on page II-27. Our initial assessment is that reflections off these balconies will cause an imperceptible increase in level, and therefore considerations of adding sound-absorbing materials, deflecting the sound off other surfaces, or elimination of the balconies will not be necessary. However, this problem will be carefully evaluated to assure that reflections off these surfaces do not cause excessive noise within the plaza.

3. Barrier wall. The barrier wall discussed as Item 2, middle of page II-24, and as Item 2, page II-27, will be carefully studied to assure that it will provide sufficient shielding of the plaza level from vehicle noise on Sacramento Street.

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8 NOV 1976
Architects Associated

Charles M. Salter, P.E. 350 Pacific Avenue, San Francisco, CA. 94111

tel: (415) 397-0442

4. Sound-isolating wall assemblies. Item 2 on page II-25 identifies the requirements for sound-isolating wall assemblies to attenuate traffic noise. Sound-isolating wall assemblies are now required by California Administrative Code, Title 25, Chapter 1, Subchapter 1, Article 4, Noise Insulation Standards, and will be an important consideration during our involvement with this project.

The noise section of the subject report is well done and adequately identifies those areas of acoustical interest. We look forward to working with you after project approval has been received.

Very truly yours,

Charles M Salter

Charles M. Salter, PE
Member, INCE

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8 NOV 1976
Architects Associated

CMS:RS:1107

Response to comments received from Mr. Lyman Jee, President, Arcon, Inc.

1. Page I-1 and II-1 - Comment noted. Text here and elsewhere in Draft EIS has been corrected.

2. Page II-9 - The recommended mitigating measure in the Draft EIS which would have encouraged short term parkers has been removed due to increased street capacity on Sacramento Street resulting from towaway zones being in effect during peak hours. Please see other comments on this point under the responses to the Nob Hill and to Bolles Associates.

3. Page II-25 - Mitigation 1. Comment noted. Alternative means of achieving HUD Noise Standards will be reviewed and considered.

4. Page II-27 - Mitigation 2. Comment noted.

5. Page II-30 - Comment noted.

6. Page II-54, #4. Comment noted.

The letter from Charles M. Salter, Acoustical Engineer addressed to Architects Associated which accompanied the Arcon, Inc. comments was referred to in the body of those comments and does not require a response from HUD. The points discussed refer to items which will be finally resolved before HUD insures the mortgage, as recommended in the Draft EIS.

9.15E

Advisory Council on
Historic Preservation
1522 K Street N.W.
Washington, D.C. 20005

October 14, 1976

Mr. James H. Price
Area Director
San Francisco Area Office
Department of Housing and
 Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Price:

This is in response to your request of September 27, 1976, for comments on the draft environmental statement (DES) for the Mei Lun Yuen Development of the Chinatown Redevelopment Area in San Francisco, California. The Advisory Council notes from its review of the DES that the Department of Housing and Urban Development (HUD) has determined that the proposed undertaking will not affect properties included in or known to be eligible for inclusion in the National Register of Historic Places. Accordingly, we have no further comment to make at this time. We would suggest, however, that the final environmental statement for the project, contain evidence of the California State Historic Preservation Officer's concurrence in HUD's determination of no effect.

Should you have any questions or require additional assistance, please contact Michael H. Bureman of the Council staff at P.O. Box 25085, Denver, Colorado 80225, telephone number (FTS) 234-4946. Your continued cooperation is appreciated.

Sincerely yours,

Louis S. Wall

Louis S. Wall
Assistant Director, Office
 of Review and Compliance

The Council is an independent unit of the Executive Branch of the Federal Government charged by the Act of October 15, 1966 to advise the President and Congress in the field of Historic Preservation.

Response to Comments Received from
Louis S. Wall, Assistant Director
Office of Review and Compliance,
Advisory Council on Historic Preservation

1. HUD has coordinated with the California State Historic Preservation Officer to resolve potential differences relating to the Donaldina Cameron House and the possible location of potential archeological artifacts on the Project site. Resolution and concurrence on the issues was achieved and is contained in his letter of December 2, 1976 (see Appendix D-7). The concurrences will be provided to the Advisory Council on Historic Preservation pursuant to and in compliance with the National Historic Preservation Act of 1966.

March 3, 1849

UNITED STATES
DEPARTMENT OF THE INTERIOR

OFFICE OF THE SECRETARY

PACIFIC SOUTHWEST REGION
BOX 36098 • 450 GOLDEN GATE AVENUE
SAN FRANCISCO, CALIFORNIA 94102
(415) 556-8200

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November 5, 1976

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Mr. George B. Adams
Environmental Staff, 9.15E
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

The Department of the Interior has reviewed the draft environmental statement for the proposed Mei Lun Yuen Development of the Chinatown Redevelopment Area, San Francisco, California.

We suggest that further information on the plaza-type open space (e.g., size and whether access would be public or restricted) be included in the final statement (p. 11-2, paragraph 4).

Because the proposed project will have a possible effect upon the Donaldina Cameron House, a structure determined eligible for inclusion in the National Register of Historic Places, we recommend that the final statement contain a copy of the State Historic Preservation Officer's determination of no adverse effect. In addition, we recommend that an archeologist familiar with the area be consulted to determine if archeological monitoring during construction will be necessary.

The photographs accompanying the visual analysis (p. 111-8-12) are not clear. Given the importance of the view studies, these photographs should be reproduced by a better method.

The appropriate time for a wind tunnel study (p. 111-14, paragraph 3) would appear to be during the project design phase rather than following project approval. Pedestrian comfort in the plaza can be affected significantly by the specific placement of the proposed structures. Given the height of the proposed tower and the known tendency of large buildings to increase ground level wind speeds, further mitigation in the form of wind screens or realignment of the garage roof-top structures could be necessary to make the plaza habitable.

We appreciate the opportunity to review and comment on this draft environmental statement.

Cordially,

Webster Otis

Webster Otis
Special Assistant to the Secretary

cc: OEPR w/c incoming
Regional Director, BOR, San Francisco
Regional Director, NPS, San Francisco
Director, USGS, Reston

Response to Comments Received From Webster Otis, Special Assistant to the Secretary, United States Department of the Interior

1. Page 1, paragraph two.

   The plaza open-space will be open to the public; the text has been changed to include this statement.

2. Page 1, paragraph three.

   a. HUD concludes that this project will have no effect on the Donaldina Cameron House across the street. Initial liason contacts with the California State Historic Preservation Officer indicated some possible differences. These have now been resolved through the process authorized by the National Historic Preservation Act of 1966. See letter Appendix D-7.

   b. HUD has secured historical data to ascertain the potential of historical artifacts that may lie buried on the Project site. The present cut-excavation of the site occurred prior to the present Project. The State of California has originally indicated that potential historical artifacts might need to be protected if the foundation cuts were made prior to the 1906 earthquake and fire. As indicated in HUD's letter of November 24, 1976 (Appendix D-4) and concurred in by the California State Historic Preservation Officer (Appendix D-7) this not the case; the cut-excavation of the site occurred during the rebuilding after the 1906 earthquake and fire. HUD is recommending that the Office of Environmental Review in the City Planning Department issue a conditional construction permit providing for an assessment of cultural resources if significant historical and prehistorical values are discovered during construction.

3. Page 1, paragraph four.

   HUD regrets that the photographs of the several views from behind the Project were not as clear as desired. Several different methods were considered for inclusion in the Final EIS. However, HUD concluded that the additional costs do not warrant the additional benefits in clarity of detail. The proportions and easily identifiable structures serve to illustrate the segments of potential view blockage. The photographs have been rearranged for clarity.

4. Page 1, paragraph five.

   The final detailed construction plans have not been fully completed. Consideration of wind tunnel testing will be done at that time and testing will be undertaken at that time if deemed necessary. The location of the tower in the proposed project is not expected to create unusual air movements.

1357 CLAY STREET · SAN FRANCISCO, CALIFORNIA 94109

November 10, 1976

Mr. George B. Adams
Environmental Staff, 9.1SE
Department of Housing and Urban Development
San Francisco Area Office
One Embarcadero Center, Suite 1600
San Francisco, California 94111

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NOV 12 1976
U. S. DEPT. HUD
ENVIRONMENTAL BRANCH
SFAO

Re: 9.1SE Comments of Draft Environmental
Statement - Mei Lun Yuen Development

This project is a poor design that will not have a beneficial impact on this part of San Francisco. The tower should be constructed further down the hill so that it does not interfere with the views of residences further up on the hill. More importantly we believe that further consideration must be given to the problems of congestion and pollution which would be created by the project as proposed.

We call your attention to the San Francisco Urban Design Plan on Major New Development. Page 75. . ."The fitting in of new developments, in a broad sense, a matter of scale. It requires a careful assessment of each building site in terms of the size and texture of its surroundings, and a very conscious effort to achieve balance and compatibility in the design of the new building. . .Exceptional height can have either positive or negative effects upon the city pattern and the nearby environment. A building that is well designed in itself will help to reinforce the city's form if it is will placed, but the same building at the wrong location can be utterly disruptive."

We feel your conclusion to solving the parking garage problem is unsatisfactory. Bolles Associates has studied the architectural drawings for this site and points glaring problems with the parking structure as planned.

NOB HILL NEIGHBORS

Terry H. Covert

Terry H. Covert, Chairman

NOB HILL NEIGHBORS
1234 JONES · SAN FRANCISCO 94109

NOB HILL NEIGHBORS

Response to comments received from
Terry H. Covert, Chairman of
Nob Hill Neighbors

1(a). HUD has considered various alternative locations for the tower and finds its presently designated position to be the most appropriate. See the Design discussion (p. 111-4).

1(b). HUD feels that adequate consideration has been given to the problems of congestion and pollution not only in terms of what would be created by the Project, but also through comparison with the levels of ambient noise and air pollution. In all cases the recommendationed mitigation are in full compliance with Federal standards. See II-19 and II-25.

2. The City Planning Commission in its approval of the Master Plan for the Redevelopment Area included consideration of its acceptability under the Urban Design Plan on Major New Developments. HUD is satisfied that this Project substantially conforms to the Urban Design Plan to the greatest extent possible.

3. Your general comments regarding the parking garage problem are addressed in detail in HUD's response to the Bolles Associates Memorandum cited in your letter. See pages E-33 and 34.

CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF PUBLIC WORKS

OFFICE OF THE
DIRECTOR OF PUBLIC WORKS

260 CITY HALL
SAN FRANCISCO
CALIFORNIA 94102

558-3671

November 9, 1976

Mei Lun Yuen Development
Sacramento Street W/Stockton
(9.1 SE)
File #17

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

This is in reference to your request for comments on your Draft Environmental Impact Statement on the Mei Lun Yuen Development, your File 9.1 SE.

In general, we agree with your traffic generation estimates. For your two peak-hour calculations, we offer the following:

1. Existing Volumes. The volumes used actually apply to Sacramento Street, east of Stockton Street. Our 1974 counts for west of Stockton Street (project site) show somewhat lower figures with 446 vehicles, 4-5 p.m., and 498 vehicles, 5-6 p.m.

2. Long-Term Parkers. Your report shows 98 trips in the 5-6 p.m. time period. We believe that this figure could be applied over the 2-hour peak period (4-6 p.m.).

3. Theoretical Capacity of Sacramento Street. Your capacity of 600 vehicles is logical for the off-peak (1 lane) condition. However, during the evening peak, towaway is in effect on both sides of Sacramento Street. Therefore, a 3-lane condition exists. Reserving one lane for bus travel, we feel that the remaining two lanes can handle somewhat more than 600 vehicles per hour.

Taking the above comments into consideration, our projections show approximately 600 vehicles in the 4-5 p.m. period and 700 vehicles in the 5-6 p.m. period.

With the 3-lane configuration of Sacramento Street during the evening peak, no capacity problems are anticipated.

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If you have any questions, please contact Mr. Mark Rand of our Traffic Engineering Division at 558-3371.

Very truly yours,

S. M. Tatarian
Director of Public Works

By Jeffrey Lee
Jeffrey Lee
City Engineer

Response to Comments Received From
Jeffrey Lee, City Engineer, Through
S.M. Tatarian, Director of Public Works

1. Your comments regarding added capacity due to the towaway zones being in effect during this peak time, plus your projections of 600 and 700 vehicles for the 4 to 5, and 5 to 6 p.m. hours, respectively, show that there is no significant impact during either hour. The slight volume adjustments resulting from your calculations reveal their virtual insignificance in view of the increased capacity due to the towaway zones. The text of the EIS on pages II-5 and 6 have has been changed to reflect the added street capacity.

SAN FRANCISCO DEPARTMENT OF CITY PLANNING 100 LARKIN STREET · SAN FRANCISCO, CALIFORNIA 94102
(415) 558-3056

15 November 1976

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NOV 15 1976
U. S. DEPT. HUD
ENVIRONMENTAL BRANCH
SFAO

Mr. George B. Adams
Environmental Staff, 9.15E
U. S. Department of HUD
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Re: EE76.368/NLA - Draft EIS on Mei Lun Yuen Development of the Chinatown (Stockton/Sacramento) Redevelopment Area

Dear Mr. Adams:

This Department has reviewed the subject draft environmental impact statement, and generally supports the project and the environmental review analysis presented in your statement. We have a number of comments, however, directed both to general matters and transportation matters of the statement, which are as follows:

General Matters

1. Page II-1, second sentence: The Residence Element of the Master Plan no longer indicates appropriate densities for various locations, so this sentence is no longer accurate. It might be replaced with a sentence indicating that "It is in conformity with San Francisco's Master Plan, as was determined by the City Planning Commission under Resolution No. 7176 on April 25, 1974."

2. Page II-1, third sentence: Zoning districts should be better defined, and proposed new zoning taken into account. The sentence might be rewritten to read "The site is within C-3-G (Downtown General Commercial) and R-5 (Highest Density Multiple Residential) districts (see zoning map opposite following page), as are the areas surrounding the site. It is proposed by the City's Residential Zoning Study for a PR (Planned Residential) district, under which the Redevelopment Plan would provide all zoning regulation."

3. Page II-10, fourth paragraph: It should be noted that no rare or endangered plant species are on the site, to supplement the statement in the second paragraph related to wildlife.

4. Page II-6, with respect to CO, SOx and Particulates: It is suggested that "% Variance..." be rounded off to two significant figures, inasmuch as input data used in its derivation has only two significant figures.

5. Page II-24, third paragraph: It would be desirable to note, perhaps as a footnote, that mechanical ventilation involves energy consumption and may generate noise of its own.

6. Pages II-30, 31: The Chinatown YWCA, at 965 Clay Street, had Julia Morgan as its original architect, and is a historically and architecturally significant structure cited as being eligible for inclusion in the National Register of Historic Places by the State Historic Preservation Officer. While it is readily apparent that the project would not affect this building, its significance might well be noted in the EIS.

7. The San Francisco Planning Department (cited on pages II-28, III-6) should more properly be referred to as the San Francisco Department of City Planning; City Planning's Transportation Department (page II-4) should be the Transportation Section of the Department of City Planning...).

8. The San Francisco Transportation Department (cited on pages II-5, II-6) should more properly be referred to as the Division of Traffic Engineering of the Department of Public Works, if that is the agency referenced; or as the Transportation Section of the Department of City Planning, if that is the intent.

Transportation Matters

9. Page II-4: Trip figures given here (residential and commercial) are one-way trips, and for the residential trips, this includes trips by all modes, not merely by automobile. To ascertain impacts, all of these trip figures should be doubled (one entering, one leaving).

10. Page II-5, first paragraph: The number of trips attributable to short-term parking (392) is a one-way trip figure. Also, a trip generation rate of 4 trips/space is used for the short-term parking, whereas on page 4 the figure of 5 trips/space was used for the commercial parking space user; these figures should be the same, unless it is shown otherwise.

11. Page II-5, second paragraph: It is not clear what is meant by an "in" space vehicle. Third paragraph: The figure of 600 vehicles/hour for Sacramento Street is probably for one lane of traffic, during non-peak periods, rather than peak periods with three usable traffic lanes. Fifth paragraph: The highest hour of traffic volume should be given (as well as the second highest hour).

12. Page 6, peak hour calculations: All figures apparently refer to traffic exiting the project, but not to that entering. Also, it is not clear where the figures originate. For residential 5-6 P.M. trips, two different figures are used (page 4 - 35 trips, page 5 - 75 vehicles). For short-term and commercial parkers, apparently no trips have been assigned to those entering the site during the two peak periods, while

all exiting must enter as some at some point.

13. Page 6, last paragraph: If capacity with three lanes were used, rather than one lane (as per comment 11), the street would be under capacity. At any event, it would be desirable for the EIS to state the percent of capacity, as well as the absolute number.

14. Page 7, Powell Street paragraphs: The excess capacity as cited of 500 vehicles per hour during peak hours seems high, and may not be comparable to that of California Street, which has two distinct moving lanes of traffic in each direction.

15. Page 7, last sentence: To say that none of the project-generated traffic will affect Stockton Street is an overstatement. While traffic leaving the site will not use Stockton, traffic entering the site may use Stockton to get to Sacramento Street, and thence onto the site. This additional traffic on Stockton, which is already a considerably congested street, may cause further conflicts with the operation of busses and other vehicles on that street. This could become especially severe if cars waiting to enter the garage on Sacramento backed up into the intersection of Stockton and Sacramento.

16. Page 8, first paragraph: It is unclear why 84 vehicles, representing non-residential traffic, would enter the garage (on Upper Stockton) during the P.M. peak hour.

17. Page 8, second paragraph: It would be desirable to provide estimates of transit trips generated by the project, which may well be higher than auto trips generated. In addition, while it is stated that MUNI lines in the area are able to serve an additional 10,000 patrons per day, it is not indicated which lines these are, and at what time of day (during midday, evening or, somewhat unlikely, peak periods) this excess capacity is available. This section would be more adequate if expanded to include this information.

We appreciate the opportunity to comment on this EIS, and hope these comments will be helpful to you.

Sincerely yours,

Selina Bendix

Selina Bendix, Ph.D.
Environmental Review Officer

Response to comments received from
Selina Bendix, Environmental Review Officer,
San Francisco Department of City Planning

General Matters

1. Page II-1, second sentence.

   Comment noted and text changed.

2. Page II-1, third sentence.

   Comment noted and text changed.

3. Page II-10, fourth paragraph.

   Comment noted and comments from U.S. Department of Interior added to text.

4. Page (II-16), Table III.

   Comment noted and table corrected.

5. Page II-24, third paragraph.

   Comment noted.

6. Pages II-30, 31

   The Chinatown YWCA at 965 Clay Street is a full block away from the Project. It is located on a paralled street one block north and outside the area of Project influence.

7. Various pages.

   Comment noted and text changed wherever necessary.

8. Various pages.

   Comment noted and text changes wherever necessary.

Transportation Matters

9. Page 11-4

   The figures used are those provided by the Transportation Section of the Department of City Planning, and are for family Units, 3.5 round trips or 6 to 7 one-way trips; and for elderly units 1.5

round trips, or 3 one-way trips per day. To double these figures as suggested in your comments would give the number of trip ends (assuming only one stop after leaving the Project site), only half of which would be applicable to the project.

10. Page II-5, first paragraph.

    One figure is the turnover rate assumed for this garage, based on the average time of short term parkers at the Portsmouth Square garage of two hours. During an 8-hour period, there would, therefore, be four autos using a parking space. The other figure, on page II-4 is a trip generation factor per day given to us by the Transportation Section of the Department of City Planning. The text on page II-5 has been changed to reflect one-way trips.

11. Page II-5, second paragraph.

    "In" space refers to the number of vehicles that enter the garage at the space provided therefor.

    Page II-5, third paragraph.

    Yes. This results in considerably larger street capacity than given in the Draft EIS during the peak hours. (See other comments on this point.)

    Page II-5, fifth paragraph.

    Both figures are given in the table at the top of page II-6. "Existing" has been replaced in the text with "2nd highest existing" to eliminate the confusion.

12. Page II-6, peak hour calculations.

    The figures show what traffic would be on Sacramento Street at any particular point. Since automobiles entering the garage are taken off the street, and again come on the street when exiting from the garage, it is irrelevant for this purpose whether they are counted before entering or after entering. As to the origin of the figures, they were calculated from the generating factors discussed on page II-4. The 75 figure is correct and the text has been corrected.

13. Page II-6, last paragraph.

    This observation is correct. During peak hours when the tow-away zones are in effect, there are three lanes of traffic available. The right hand lane actually carries very little automobile traffic because of the busses using the lane, but the two remaining lanes almost double the normal 600 vph capacity to about 1080 (the curbside lane has only about 80% capacity). The text on page II-6 has been corrected.

14. Page II-7, Powell Street paragraphs.

The 500 figure is not the result of traffic counts, since none was available as noted in the Draft EIS, but is based on field comparison and observations. The important item here is not so much the accuracy of this figure, but the fact that the traffic to be added to Powell Street should read approximately two thirds of 242 vehicles that are Project-generated during the peak hour, rather than the total 803 vehicles from Sacramento Street. On this more accurate basis, the additional traffic is about 160 vehicles, which can certainly be absorbed by Powell Street, whether its excess capacity is 500 or somewhat less. The text on page II-7 has been corrected to reflect these changes.

15. Page II-7, last sentence.

The phrase should have read "...none of the Project's exiting traffic will affect it." The text has been corrected. For traffic entering the Project, the redesign of the traffic flow at the entrance to the garage should eliminate any backup on Sacramento Street. (See the comments from R. Pearson and Assoc., and from Balles Association on this same point.)

16. Page II-8, first paragraph.

Project residents are provided with their own parking entrance off Sacramento Stteet, and will therefore not have to use the upper Stockton Street entry. The non-residential parkers during the peak hours are calculated to be 167, fifty percent of which will use the upper Stockton Streeet entrance, according to the Project's architect. Hence the 84.

17. Page II-8, second paragraph.

The 10,000 figure refers to Bus lines 30 and 55 together. According to the Director of Transportation for the Municipal Railway System, the addition of 175 dwelling units in this area (40 elderly and 35 family types) will not adversely impact the system at any hour of the day.

SIR, I AM ASKED BY THE CHINESE NEWSPAPER TO WRITE TO YOU ABOUT THE HOUSING PROJECT AT STOCKTON & SACRAMENTO STREET. I AM AGAINST IT.

I THINK CHINATOWN ALREADY HAS TOO MANY PEOPLE. IT HAS, WITHOUT DOUBT, THE HIGH DENSITY OF PEOPLE IN THE CITY I DON'T SEE WHY YOU WANT TO PUT ALL CHINESE IN THIS LITTLE AREA

IF YOU WANT TO BUILD SOMETHING FOR THE CHINESE, BUILD IT IN THE RICHMOND OR SUNSET. CHURCH GROUPS WANT YOU TO BUILD HERE ONLY FOR THEIR OWN SELFISH REASONS I AM AGAINST IT.

(HIGH CONCENTRATION ALSO BREEDS GANGSTERS)

T. CHEN.
CHINESE

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NOV 12 1976
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SFAO

Response to Comments Received From
T. Chen of San Francisco

HUD is aware of the severe density in Chinatown. This Project should help to alleviate this condition since it provides open space and other amenities not readily available in this area of San Francisco.

This Project is the result of many years of planning and pressure from members of the Chinese community. Over 1800 responses in support of Mei Lun Yuen were received during the circulation period of the Draft EIS.

Appendix F Comments Received During Draft Circulation Period from Federal, State and Local Agencies Which Do Not Require Replies From HUD

VETERANS ADMINISTRATION
DEPARTMENT OF VETERANS BENEFITS
WASHINGTON, D.C. 20420

1930

Date: NOV 1976
In Reply Refer to: 262

Mr. George B. Adams
Environmental Staff, 9.1SE
U. S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

This is in reply to your letter of September 27, 1976 concerning the Draft Environmental Impact Statement for the Mei Lun Yuen Development of the Chinatown Redevelopment area in San Francisco, California.

Upon review of this Draft Environmental Impact Statement, we find that the Veterans Administration has no exposure in the Chinatown Redevelopment area. Consequently, we have no comments on the proposed development.

Sincerely yours,

Rufus H. Wilson

RUFUS H. WILSON
Chief Benefits Director

"To care for him who shall have borne the battle, and for his widow, and his orphan."– ABRAHAM LINCOLN

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
Two Embarcadero Center, Suite 530
San Francisco, California 94111

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA

IN REPLY REFER TO
9ED

November 3, 1976

Mr. George B. Adams
Environmental Staff, 9.1SE
US Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

We have reviewed the Draft Environmental Impact Statement for the Mei Lun Yuen Development of the Chinatown Redevelopment area, San Francisco, California, and have no specific comments to offer.

We appreciate this opportunity to review the subject Draft Statement.

Sincerely yours,

F. E. Hawley
Regional Administrator

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FEDERAL POWER COMMISSION
WASHINGTON, D.C. 20426

IN REPLY REFER TO:

October 5, 1976

Mr. George B. Adams
Environmental Staff, 9.1SE
U. S. Department of Housing and
Urban Development
One Embarcadero Center
Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

I am replying to your request for comments on the Draft Environmental Impact Statement for Mei Yuen Development of the Chinatown Redevelopment Area.

Our review concentrated basically on those areas of the electric power and natural gas industries for which the Federal Power Commission has jurisdiction by law, or where the staff has special expertise in evaluating environmental impacts involved with the proposed action. It does not appear that there would be any significant impacts in our areas of concern nor serious conflicts with Federal Power Commission responsibilities should this action be undertaken.

Thank you for the opportunity to review this statement.

Sincerely,

Jack M. Heinemann
Acting Advisor on
Environmental Quality

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE

2828 Chiles Road, Davis, CA 95616

November 8, 1976

Mr. James H. Price
Area Director
Department of Housing and
Urban Development
San Francisco Area Office
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Price:

The Soil Conservation Service has completed review of the draft Environmental Impact Statement for the "Mei Lun Yuen Development of the Chinatown Redevelopment Area in San Francisco, California.

Our review indicates that environmental issues falling within areas of Soil Conservation Service concern have been adequately treated. We appreciate the opportunity provided for review and comment.

Sincerely,

for

FRANCIS C. H. LUM
State Conservationist

cc: R. M. Davis, Administrator, USDA, SCS, Washington, D. C. 20250
Fowden G. Maxwell, Office of the Coordinator of Environmental Quality Activities, Office of the Secretary, USDA, Washington, D. C. 20250
Council on Environmental Quality, 722 Jackson Place, N. W., Washington, D. C. 20006 - Attn: General Counsel (5 copies)
Kenneth L Williams, Director, WTSC, SCS, Portland, Oregon

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DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
SOCIAL SECURITY ADMINISTRATION
145 COLUMBUS AVENUE
SAN FRANCISCO, CALIFORNIA 94133

REFER TO:

TELEPHONE: 415-556-0165

November 9, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

I am pleased to see the completion of the Environmental Impact Statement for the Mei Iun Yuen Project. I trust that this will be the final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and I urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. I hope that there will be no further delays.

Thank You.

Sincerely,

Pauline Kan Lee

Pauline Kan Lee

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SFAO

UNITED STATES OF AMERICA
GENERAL SERVICES ADMINISTRATION
Public Buildings Service
Washington, DC 20405

NOV 9 1976

Mr. George B. Adams
Environmental Staff, 9.1SE
U.S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

The General Services Administration has reviewed the draft environmental impact statement for the MEI LUN YUEN DEVELOPMENT of the Chinatown Redevelopment Area, San Francisco, California, and our review of this draft discloses no problems of concern to this agency.

Thank you for giving us the opportunity to comment.

Sincerely,

Andrew E Kauders

ANDREW E. KAUDERS
Director, Environmental Affairs Division
Special Studies and Programs Office

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November 15, 1976

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SFAO

Mr. George B. Adams
Environmental Staff, 9.1SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

Thank you for the opportunity to comment on the Draft EIS for the Mei Lun Yuen Development of the Chinatown Redevelopment Area in San Francisco. ABAG staff has reviewed this document in terms of its adequacy in discussing impacts of regional significance. Comments are those of staff and ought not to be construed as official ABAG policy either in support of or in opposition to the proposal.

ABAG staff research has indicated that, according to the 1970 Census of Housing, San Francisco has the largest proportion of inadequately housed renter households of any jurisdiction in the entire Bay Area. The development of 175 new housing unts that will be accessible to low and moderate income families in San Francisco's Chinatown is certainly consistent with the City's attempts to respond to its housing problems. Completion of the project would also evidence San Francisco's commitment to expand the supply of housing in accord with the Region's housing needs, especially for low and moderate income people. Staff would urge therefore that Mei Lun Yuen be successfully and expeditiously completed.

Sincerely,

John H. McKoy

John H. McKoy, Director
Planning/Programming

STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY
EDMUND G. BROWN JR., Gove

DEPARTMENT OF TRANSPORTATION
P. O. BOX 3366 RINCON ANNEX
SAN FRANCISCO 94119
(415) 557-1840

October 8, 1976

4-SF-Gen

Mr. George B. Adams
Environmental Staff, 9.ISE
U. S. Department of Housing and Urban
Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

This is in response to your referral of the Draft Environmental Impact Statement (DEIS) on the Mei Lun Yuen Development of the Chinatown Redevelopment Area in San Francisco.

We have reviewed the Draft and consider it to be adequate insofar as functions and responsibilities of the Department of Transportation are concerned.

Sincerely yours,

T. R. LAMMERS
District Director

By
B. C. BACHTOLD
Deputy District Director

CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF PUBLIC HEALTH
COMMUNITY MENTAL HEALTH SERVICES

NORTHEAST MENTAL HEALTH CENTER
Chinatown Clinic
1548 Stockton Street
San Francisco, Ca. 94133
(415) 398-0981

November 9, 1976

Mr. George B. Adams
Environmental Staff 9.1 SE
U. S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, Calif. 94114

Dear Mr. Adams,

It is to my understanding that the Environmental Impact Statement has been completed for the Mei Lun Yuen Project. I entrust that this will be the final Envirommental Impact Statement, for there has been more than adequate studies done. At this time I urge that HUD proceed with the project to provide urgently needed housing in Chinatown.

The need for decent, low and moderate priced housing is still an existing and pressing problem in Chinatown. To further delay construction would only perpetuate the environmental stresses in the community. The community has listened and waited patiently for the past three years for this purposed housing. The community can no longer tolerate the unnecessary delay. I urge that HUD proceed expeditiously so that construction can commence.

Sincerely,

Mabel W. Jung

Mabel W. Jung, RN
Program Director of
Chinatown Clinical Services

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NOV 11 1976
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ENVIRONMENTAL BRANCH
SFAO

cc: Chinatown Coalition for Better Housing

CITY AND COUNTY OF SAN FRANCISCO

COMMISSION ON THE STATUS OF WOMEN
50 FELL STREET
FIRST FLOOR
SAN FRANCISCO, CALIFORNIA 94102
TELEPHONE 558-3653

November 9, 1976

Mr. George B. Adams
Enviornmental Staff, 9.1 SE
U. S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

The Commission on the Status of Women at its regular meeting today voted to support the Mei Lun Yuen project at Sacramento and Stockton Streets in San Francisco. The Commission has been in firm support of low-income housing for elderly persons and families with children.

The housing needs in the Chinatown community are well-known. Since Mei Lun Yuen is the only redevelopment project in the Chinatown area, we urge you to proceed ahead so that construction may begin as soon as possible.

Sincerely,

Del Martin

Del Martin
Chairperson

DM:tl

cc: Chinatown Coalition for Better Housing

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SAN FRANCISCO UNIFIED SCHOOL DISTRICT
SAN FRANCISCO, CALIFORNIA
CHINESE EDUCATION CENTER
949 WASHINGTON STREET
982-9550
94108

November 10, 1976

Mr. George B. Adams
Environmental Staff 9.1 SE
U. S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams,

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for the proposed housing. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project.

We urge that HUD proceed expeditiously so that construction can begin and that there will be no further delays.

Sincerely,

Dr. Michael H. Kittredge
Principal

Rosemary Chan

Rosemary Chan
Community/Screening Teacher

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CITY AND COUNTY OF SAN FRANCISCO

HUMAN RIGHTS COMMISSION OF SAN FRANCISCO

1095 MARKET STREET
SUITE 501
SAN FRANCISCO, CALIFORNIA 94103
TELEPHONE 558-4901

November 5, 1976

Mr. George B. Adams
Environmental Staff, 9-1SE
U.S. Dept. of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Re: Draft Environmental Impact Statement
Mei Lun Yuen Development
San Francisco, California
(9-1SE)

Dear Mr. Adams;

Thank you for providing me with a copy of the Draft Environmental Impact Statement for the Mei Lun Yuen Development. I found the document quite clear, well researched, and concise. The H.U.D. Environmental Staff has done a commendable job.

I agree with the findings of the statement that the few adverse effects (i.e.--view blockage, noise level, and exhaust fumes) are overwhelmingly mitigated by the benefits to Chinatown and San Francisco.

I am sure that the sponsors of the project can count on the cooperation of the Department of Housing and Urban Development in making the Mei Lun Yuen Project a reality.

Human Rights Commission action is forthcoming.

Sincerely,

David Prowler
Housing Specialist

DP:va
cc:Moira So, Department of City Planning
Rev. Harry Chuck, Chinatown Coalition
For Better Housing

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Donaldina Cameron House

920 SACRAMENTO ST. • SAN FRANCISCO, CALIF. 94108 • [415] 781-0401 • CHRISTIAN SERVICE DEPT. 392-4768

November 12, 1976

Colleagues:

Director—
F. S. Dick Wichman
D. D.

Staff Associates—
Harry J. Chuck, Jr.
D. D.
Reverend Gordon Lam
Reverend David Peng
Reverend David Kao
Reverend Theodore Tang
Sister Beverly Karnatz
C. S. J.
Mr. Michael Wong
Mr. Clinton Choy

Administrative Assistant—
Mrs. Enid Ng Lim

Christian Service Dept.—
Mr. Buddy Tate-Choy
M. S. W., Director
Mrs. Diana Ming Chan
A. C. S. W.
Ms. Doreen Der
M. S. W.
Miss May N. Wong
Mrs. Sunny Hee
Mrs. Helena Ching
Ms. Mary Wong

長老會金美倫堂

Mr. George B. Adams
Environmental Staff 9.1SE
United State Department of
Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

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Dear Mr. Adams:

The lay leaders of the Donaldina Cameron House, in conjunction with the Presbyterian Church in Chinatown, are deeply committed and involved in the improving of the social and environmental qualities of the Chinese community. The work of Cameron House for over 100 years has been committed to humanizing efforts. Its building was designated a San Francisco landmark for its historical significance rather than architectural uniqueness, because from this site has emanated profound social concern that has continually improved the community life of Chinatown and the city of San Francisco. It is the fulfillment of this heritage that has brought into being the Mei Lun Yuen Development.

The project is directly across the street from the Donaldina Cameron House. This site was formerly a rat-infested firetrap tenement which housed numerous menaces to community health. The conversion of this site to an attractive housing for families and senior citizens tremendously improves environmental impact on this historical landmark. Our presence across the street from Mei Lun Yuen will be of mutual benefit.

Cameron House is the oldest building in the neighborhood (with the exception of the Fairmont Hotel for whose protection our original building was dynamited during the earthquake and fire). Gradually, our view, sun and air ways have been blocked by high rises that project grotesque garages, parking lots and blank walls against us. It will be a tremendous improvement to the Chinese portion of the lower hillside neighborhood to have the attractive Mei Lun Yuen building hide the ugly rear facades of these high rises.

The open space planned for the project will be a delight to us and the entire neighborhood.

There is nothing that would enhance the position of this historical landmark more than a project that compliments our own purpose. Our lay leaders have exercised considerable influence to make sure that the development would do just that.

I am not an authority on wind. You know, and I would hope that the departments would know, that there are already a whole row of high rises flanking the hill above us. It seems to me that the Mei Lun Yuen is more apt to be a wind break than to create a wind tunnel.

Perhaps the most archeological interest in the entire area (although I have never used that word for such recent structures) is our building and the old tunnel in our basement. This was formed by foundation differentials, so a pre-earthquake foundation has been preserved. How many pre-earthquake foundations need to be preserved? And, should more be preserved at the expense of present and future families and senior citizens?

Having studied the EIS prepared by HUD, we foresee no negative impacts of the development upon this San Francisco landmark. We wholeheartedly support the development and urge speedy acceptance of the report so that the housing may be realized.

Sincerely,

F. S. Dick Wichman, D.D.
Director

FSDW:el

會聯進協屋住埠華
CHINATOWN COALITION FOR BETTER HOUSING
920 SACRAMENTO STREET
SAN FRANCISCO, CALIFORNIA 94108
PHONE (415) 781-0401

November 11, 1976

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Mr. George B. Adams
Environmental Staff 9.1SE
U.S. Department of Housing and Urban Development
1 Embarcadero Center, Suite 1600
San Francisco, Ca. 94111

Re: EIS for Mei Lun Yuen

Dear Mr. Adams:

The Chinatown Coalition for Better Housing is pleased that the EIS for Mei Lun Yuen was completed so expeditiously by your office. We have toiled long and hard to bring about this project, and see the EIS as drafted by your office as fulfilling the requirements for such developments adequately.

Since many different persons from many different organizations and agencies have been involved in this project at various points in time, we would like to take this opportunity to recount briefly the history of this project up to the point of site selection. The CCBH, in conjunction with the San Francisco Department of City Planning and the Redevelopment Agency, spent many months carefully scrutinizing and studying the potential of the housing sites listed in the 701 Study of Chinatown Housing and Recreation, considering such factors as immediate availability, potential capacity, etc. Only after such careful study was the Stockton/Sacramento Street site selected. It was judged at that time that this site had the following major advantages:

1) the site was large enough to produce enough units to make it probably economically feasible and worth all the effort it would require to develop the project.

2) a good proportion of the land was up for sale, thus making it immediately available and limiting the time that would be required for land acquisition.

3) buildings on that site were blighted and unsafe for human habitation.

4) the displacement that would result would be minimal, relatively insignificant for a site in the core of Chinatown.

5) From hindsight, erecting this project would have the positive impact of keeping the Chinese community from having to view the buildings of the people up the hill who have gone to and made use of all manner of devices to slow down, question and in effect oppose this project.

Although this last point is said facetiously, we cannot help but emphasize the *positive social impact* that this project will have, given an adequate level of rent subsidies. San Francisco's worst housing is to be found in Chinatown; what better way is there to have a positive environmental impact than to construct this project as proposed and thus provide safe and decent housing to 175 low- and moderate-income households. The number of units to be provided by this project will in no way solve Chinatown's housing problems, but will be a significant step in the right direction.

In closing, we cannot agree with you more that the partial blocking of the views of approximately 19 nearby residential units is a *minor* adverse impact. We urge that the draft EIS for Mei Lun Yuen Development be adopted as the final EIS for this project.

Sincerely yours,

Linda Wang

Linda Wang,
Co-Chairperson

ON LOK SENIOR HEALTH SERVICES

BAHAY PAGASA
CENTRO DI SALUTE PER GLI ANZIANI

安 樂 居

ADMINISTRATION:
1490 MASON STREET
SAN FRANCISCO, CALIFORNIA 94133
TELEPHONE: (415) 989-2578

November 19, 1976

Mr. George B. Adams
Environmental Staff 9.1 SE
U. S. Dept. of Housing & Urban
Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

We are sorry that we are a little late in writing this letter of support, but unfortunately, some pressure of work did not permit us to get to this earlier.

We are very pleased to see that the Environmental Impact Statement for the Mei Lun Yuen Project in Chinatown has been completed. We have read the copy of this study and feel that this is a very comprehensive report and adequately represents the situation in this community.

We hope that HUD will now proceed very expeditiously with the necessary authorizations so that construction can begin as soon as possible. We are sure that you are aware how urgent the need for decent, low and moderate income housing is. We sincerely hope that there will be no further delays. Thank you very much for attention to this matter.

Very sincerely yours,

Marie-Louise Ansak
Executive Director

MLA/alw

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SAN FRANCISCO SAN FRANCISCO SAN FRANCISCO SAN FRANCISCO DEPARTMENT OF CITY PLANNING 100 LARKIN STREET · SAN FRANCISCO, CALIFORNIA 94102

November 15, 1976

Mr. George B. Adams
Environmental Staff 9.1 SE
U.S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams,

As a member of the Chinese-American community and of the City Planning Commission, I have been made aware that Chinatown has the greatest housing need in San Francisco. The Mei Lun Yuen Project is one small step to alleviate the problem.

Our community has long awaited this first, small response to our housing needs. I hope that HUD will respond without further delay. Thank you.

Sincerely,

Gordon J. Lau
GORDON J. LAU

GJL:bf

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OUNG MEN'S CHRISTIAN ASSOCIATION OF SAN FRANCISCO

A Member Agency of the United Way of the Bay Area

CHINESE BRANCH

855 SACRAMENTO STREET
SAN FRANCISCO, CA 94108
TELEPHONE (415) 982-4412

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Youth Representative

STAFF

MATTHEW FONG, A.C.S.W.
Executive Director
DAMON AU
DAVID DONG
Associate
Youth Program Directors

Mr. George B. Adams,
Environmental Staff, 9. 1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111.

Nov. 11, 1976

Dear Mr. Adams,

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust that this will be the final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely,

Matthew Fong, A.C.S.W.
Executive Director

c.c. Cynthia Joe
c.c. Rev. Harry Chuck

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PERPETUATE YOUR INTEREST IN YOUTH THROUGH ENDOWMENT GIFTS AND BEQUESTS TO THE YMCA

三藩市華人聯合美以美會
CHINESE UNITED METHODIST CHURCH
920 WASHINGTON STREET
SAN FRANCISCO, CALIF. 94108
Telephone: Church and Residence - 981-8408
Hip Wo Academy - 781-4496
Minister: TIMOTHY TAM
牧師譚志天

November 14, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

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Dear Mr. Adams:

I was directed by the Board of directors of the Chinese United Methodist Church of San Francisco to write this letter in support of the building of the Mei Lun Yuen Project at Stockton and Sacramento Streets.

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust that this will be the final Environmental Impact Statment. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely,

Timothy Tam

Timothy Tam, pastor,
Chinese United Methodist Church.

Asian Community Center
846 Kearny St.
San Francisco, Ca. 94108

Mr. George B. Adams
Environmental Staff 9.1 SE
U.S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

November 15, 1976

Dear Mr. Adams:

Housing in Chinatown-Manilatown is some of the worst in the nation. Here, we are forced to live in one-room hotel rooms, squeeze our families into them or into one-bedroom apartments to save on high rents. We work all day at unlivable wages to come home and fight off rats and roaches. Landlords won't keep up their buildings because they can't make money from them. And then we're kicked out of our housing because big business wants to develop the area for their own profits.

Can we move to other buildings? No. We can't and we won't! This year alone, six hotels in Chinatown have been evicted already. The 701 project now known as the Mei Lun Yuen Project was won through the hard fight waged by the elderly and the working people of Chinatown. We fought with demonstrations and relied on our own strength to win the Stockton and Sacramento site for low- and moderate-priced housing. It's been four years already and there is still no progress. But even if the project was built, how could it house the 10,000 elderly in Chinatown/Manilatown? One project is not enough.

We demand that HUD quit shuffling its feet and get the ball rolling so that construction on the project can begin immediately.

Asian Community Center

cc : Presbyterian Church in Chinatown

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Presbyterian Church in Chinatown
UNITED PRESBYTERIAN CHURCH, U. S. A.
925 STOCKTON STREET • SAN FRANCISCO, CALIFORNIA 94108

PARISH HOUSE
920 Sacramento Street
SU 1-0401 EX 2-4768
COLLEGIATE PASTORS
Rev. David Peng PL 6-9415
Dr. F. S. Dick Wichman
Rev. Gordon Lam
Rev. Harry Chuck
• EXbrook 2-1500

November 9, 1976

Mr. George B. Adams
Environmental Staff 9.1 SE
U.S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Re: 9.1 SE Draft Environmental Impact Statement
Mei Lun Yuen Development of Chinatown Redevelopment Area in
San Francisco, California

Dear Mr. Adams,

Thank you for sending copies of the Environmental Impact Statement for Mei Lun Yuen and for expediting the study.

After careful review of the Environmental Impact Statement, the Presbyterian Church in Chinatown, subject to recommendations from our architects and HUD financing, endorses the objective and thorough work of HUD staff in compiling the report.

The study attempts to give fair consideration to the various concerns expressed about Mei Lun Yuen over the last three years. The few adverse effects as cited in the study are negligible in comparison to the great need for decent housing in Chinatown. We concur with the recommended action of the study: that the sponsor and HUD resume timely and critical discussions and work in order that the project proceed.

Throughout the last three years, the housing shortage in Chinatown has accelerated. We hope that there will be no more further delays which may jeopardize the provision of this much needed low/moderate income housing in our community. We urge your office to conclude the acceptance of this report as soon as possible.

Sincerely,

Cynthia Joe

Cynthia Joe, Chairperson
Housing Committee of the
Presbyterian Church in
Chinatown

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Chinatown Transportation Research and Improvement Project
C/O 615 Grant Avenue 4/F
San Francisco, CA 94108

10 November 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

As a group of citizens concerned with the well-being of Chinatown and its citizens, we support the proposed Mei Lun Yuen Project.

We urge HUD to approve the draft Environmental Impact Statement for the Mei Lun Yuen Project as soon as possible.

The negative environmental impacts described in the draft, e.g. noise and traffic, can be solved. We feel that these problems are minor and over-exaggerated. The social ramifications of the project must also be considered. The Mei Lun Yuen Project will provide additional low and moderate cost housing units for Chinatown residents. The overwhelming impact of the Mei Lun Yuen Project is beneficial to the Chinatown community.

The need for decent, low and moderate priced housing is a very pressing problem in Chinatown. The community has waited patiently and expectantly for the past three years for this proposed housing. We urge that there be no further delays to the construction of the Mei Lun Yuen Project.

Thank you.

Sincerely,

Sue Lee

Sue Lee
Chinatown Transportation Research and Improvement Project

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美國三藩市東華醫院

CHINESE HOSPITAL
835 JACKSON STREET
SAN FRANCISCO, CALIFORNIA 94133
982-2400

November 10, 1976

Mr. George B. Adams,
Environmental Staff, 9.1SE
U.S. Department of Housing & Urban Development
One Embarcadero Center, Suite 1600
San Francisco, Ca. 94111

Dear Mr. Adam:

We have studied the Environmental Impact Statement for the Mei Lun Yuen Project.

Although the study points out some minor negative impact on the environment, we wish to point out that its positive effects far out weight its negative effects.

Chinatown residents have long suffered from the detrimental effects of poor housing. They look forward to the completion of the Mei Lun Yuen Project. The unsafe and unsanitory housing condition in Chinatown can not be permitted to continue.

We urge that approval of the Mei Lun Yuen Project be given forthwith so that the Project can be completed.

Thank you.

Sincerely yours,

Stephen Fong
President

SF:kc

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THE san francisco JOURNAL
927 kearny st. S.F., Ca. 94133 / a perspective on the news: local, national, the third world, asian america
tel: (415) 391-6448

November 12, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
US Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, Ca 94111

Dear Mr. Adams,

The Mei Lun Yuen Housing Project for San Francisco's Chinatown is desperately needed. We are sure that with all the studies conducted, the fact that the need for low and moderate priced housing is less than adequately met with the current supply.

We urge that with the completion of the Environmental Impact Statement, construction can soon begin. Because of the constant rise in building and related costs, construction needs to start soon to ensure the speedy completion of this project.

The Housing Committee of the Presbyterian Church in Chinatown has worked seriously on the Mei Lun Yuen Housing Project to help alleviate some of the pressing needs. We hope that there will be no further delays.

Thank you.

Sincerely,

The San Francisco Journal

cc: Ms. Cynthia Joe, Housing Committee of the Presbyterian Church
in Chinatown.

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ASIAN COMMUNITY LIBRARY

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Nov. 13, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Depatment of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, Ca. 94111

Dear Mr. Adams:

I am writing in regards to the Mei Lun Yuen Project in San Francisco Chinatown.

As I'm sure you're aware, there is a severe shortage of low-cost housing in Chinatown, the most congested neighborhood in San Francisco. The Mei Lun Yuen Project, which would help to alleviate some of the housing problems in the community, has been delayed for three years already awaiting the go-ahead signal from HUD. As much as I agree with the necessity of careful planning, I believe enough study has been made on the environmental impact of the Stockton/Sacramento project. The longer we wait, the higher the construction cost and the longer people have to suffer under present inadequate housing conditions.

I urge that your agency proceed in all due haste on this project so that construction can begin immediately.

Yours sincerely,

Judy Yung
Judy Yung
Librarian
Asian Community Library

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Aklatan Ng Mga Taga Asya • Thữ-Viên Công-Dỗng Ấ-Châu

COMMITTEE FOR BETTER PARK AND RECREATION FACILITIES IN CHINATOWN
920 SACRAMENTO STREET, SAN FRANCISCO, CALIFORNIA 94108

Nov. 10, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
HUD
One Embarcadero Center, Suite 1600
San Francisco, Calif. 94111

Dear Mr. Adams,

We are please to see that HUD has completed its Environmental Impact Study of the Stockton/Sacramento Site Project. We were a little surprised to find that there was another environmental impact study being done since there has already been two EIR completed on this project. We feel that there has been more than adequate study of the environmental impact and urge that all necessary procedures be expedited so that the community can finally see the fruition of the proposed housing.

We feel that Mei Luen Project will not only provide badly needed low and moderate income housing in Chinatown, but that it will also add open space to an area where open space is sorely lacking. We support the Stockton/Sacramento Site Project and urge HUD to move quickly on expediting this project.

Sincerely,

Doreen Der
Donna Yick
Doreen Der/Donna Yick
Co-chairpersons

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CHINESE AMERICAN CIVIC COUNCIL, INC.
619 CLAY STREET
SAN FRANCISCO, CA 94111

Lim P. Lee, *Co-Chairman*
Dr. Dennis Wong, *Co-Chairman*
Jackson K. Hu, *Secretary*
Melvin D. Lee, *Treasurer*

November 5, 1976

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S. K. Wong
Zeppeline Wong
Dean Woo
Dr. John Woo
Dr. Thomas W. S. Wu
Frank S. Yee
Judge Samuel E. Yee
Gus Lee

Rev. Harry Chuck
Co-Chairperson
Chinatown Coalition for Better Housing
920 Sacramento Street
San Francisco, Ca. 94108

Dear Reverend Chuck:

If you were not a minister of the cloth, I have a few prize words to say about that (S) Nob Hill bunch. Did you realize that they fought us in 1936 when we started the Ping Yuen Housing Project? It was nowhere near them, and yet they fought us.

Due to time restraint, I could not attend your Committee meetings. I am not as young as I was in 1936, and I haven't got the energies I used to have.

Our Board of Directors will meet on Wednesday, November 10th, and after they pass a Resolution, you can count on our 100% Support.

Good Luck!

Yours in friendship,

Lim P. Lee
Postmaster

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Regular Meeting: First Wednesday every month – Joe Jung's Restaurant

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Conducted By
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SAN FRANCISCO LABOR MANAGEMENT & COMMUNITY — JOINT EFFORT

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HANS WACHSMUTH
ASSOCIATED GENERAL CONTRACTORS OF CALIF
ALVIN NORMAN
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LLOYD BARTON
SPRINKLER FITTERS No 483

Board Consultants
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SECRETARY TREASURER AND BUSINESS REPRESENTATIVE SAN FRANCISCO BUILDING AND CONSTRUCTION TRADES COUNCIL
JOHN F DONOVAN
BUREAU OF APPRENTICESHIP AND TRAINING U S DEPT OF LABOR
STANLEY H. NEYHART
COUNSEL

November 9, 1976

Mr. George B. Adams
Environmental Staff 9.1 SE
U.S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

We are pleased to hear that the Enviromental Impact Statement (EIS) for the Stockton Sacramento Project is completed. We feel that the EIS is more than adequate and that no further delays should be tolerated.

We support the efforts of the Chinatown community to provide decent housing for low income families and the elderly. Furthermore, we feel that the project will provide jobs for those wishing employment in the construction industry, especially those who are residents of the community. We urge you to move expeditiously so that construction of this project may begin.

Thank you.

Sincerely,

APPRENTICESHIP OPPORTUNITIES FOUNDATION

Joseph Day

JOSEPH DAY, DIRECTOR

JD/bw
ope 3 afl-cio

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170 1182 MARKET STREET • ROOM 311 • SAN FRANCISCO, CALIFORNIA 94102 • TELEPHONE (415) 621-9712

三藩市國語浸信會
SAN FRANCISCO MANDARIN BAPTIST CHURCH
1370-19th Avenue
San Francisco, Calif. 94122
Tel: (415) 665-0295

November 9. 1976

MR. George B. Adams
Environmental Staff, 9.15E
U.S. Department of Housing and
Urban Development
One Embarcadero Center, suite 1600
San Francisco, CA. 94111

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NOV 10 1976
U. S. DEPT. HUD
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Dear Mr. Adams:

We are pleased to see the Completion of the Enviromental Impact Statement for the Mei Lun Yuen Project. We trust that this will be the final Enviromental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and We urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely,
Henry H.S. Mu
Pastor
S.F Mandarin Baptist Church

華埠幼兒樂園

Chinatown
Community
Children's
Center

979 Clay Street, San Francisco, CA 94108 · 986-2528

November 9, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust that this will be the final environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past year for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely,

Ruth Yee

Ruth Yee
Director

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Center for
Southeast Asian Refugee Resettlement

944 Market Street, Room 811, San Francisco, California 94102
(415) 982-6724

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November 8, 1976

Mr. Georges B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust that this will be the final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

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Thank you.

Sincerely,

Vu-dinh Dinh
Director

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VD/CJ:sp

Cooperating Agencies:
YWCA of San Francisco
Youth Service Center
United Pilipinos for Equal Employment
San Francisco Skills Center
Sandigan Filipino Newcomers Service Center
Oakland Chinese Community Council
The Multi-Service Center for Koreans
International Institute
Filipinos for Affirmative Action, Inc.
Donaldine Cameron House
Chinese Newcomers Service Center
Chinese for Affirmative Action
Chinese Bilingual Education Program / SFUSD
Chinatown / North Beach Family Planning Services, Inc.
Chinatown Resources Development Center
ASIAN, Inc.
Alemany / Chinatown Community College Center

IISSION POSSIBLE RE-ENTRY-HOUSE

1451 THOMAS AVENUE
SAN FRANCISCO, CA 94124

P. O. BOX 24011, SAN FRANCISCO, CA 94124
TELEPHONE: 822-3343

LARRY MOORE
EXECUTIVE DIRECTOR

"When a friend asks, there is no tomorrow"

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F DOMENIC AMENNUNO
F . W. L. HICKS
F BENVENUTE BAVERO
C UDE T. EVERHART
S. SHIRLEY JONES

November 8, 1976

Mr. George B. Adams,
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

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The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely,

Larry Moore

Larry Moore,
Executive Director

LM/fjh

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FIRST CHINESE
SOUTHERN BAPTIST CHURCH

三藩市第一華人美南浸信教會

November 10, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U. S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco
California 94111

Dear Mr. Adams:

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust that this will be the final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/ Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely,

Lawrence Au, D. Min.
Pastor

LA:pc

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SFAO

Rev. Lawrence Au, Pastor
1255 HYDE STREET
SAN FRANCISCO, CALIFORNIA 94109
PHONES 775-4288 / 775-2763
牧師：區國宇

美國三藩市
聖瑪利華人天主教會
ST. MARY'S CHINESE MISSION
Paulist Fathers
902 Stockton Street San Francisco, California 94108

362-7394
986-4388

November 10, 1976.

Mr. George B. Adams
Environmental Staff, 9.1. SE
U. S. Department of Housing
and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust that this will be final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely,

Father Charles A. Donovan CSP
Rev. Charles A. Donovan, C.S.P.
Director

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NEMS

north east medical services
東 北 衛 生 服 務 處

615 GRANT AVENUE SAN FRANCISCO, CALIFORNIA 94108 TELEPHONE (415) 982-6009

November 10, 1976

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Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust that this will be the final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

NEMS is a federally-funded neighborhood health center serving over 7600 residents in the Chinatown-North Beach community of San Francisco since 1971. From our almost 6 years of experience, we have found that there is certainly a very real lack of decent, low and moderate priced housing in this area for our registrants.

NEMS and the community have waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays!

Thank you.

Sincerely yours,

Sophie H. Wong
Executive Director

SHW:kl

華 人 青 年 輔 導 所
CHINESE YOUTH ALTERNATIVES
944 Market Street / SAN FRANCISCO, CALIFORNIA 94102 / (415) 981-6150

November 11, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams,

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust that this will be the final Environmental Implact Statement. There has been more than adequate study of the environmental impact of the Stockton/Scramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely,

Wayne Yee

Wayne Yee
Executive Director

cc Cynthia Joe, Housing Committee
of the Presbyterian Church in Chinatown

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SELF-HELP FOR THE ELDERLY
3 Old Chinatown Lane
San Francisco, California 94108
Aiuto Da Se Stessi Per Gli Anziani 安老自助處 Saraling Tulong Sa Matatanda

An Economic Opportunity Council Project
Main Office (415) 982-9171
Mid-Stream Employment Program 433-6112
Inter-Ethnic Meals Program 433-7843

November 11, 1976

Mr George B Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr Adams:

It has come to our Agency's attention that a second Environmental Impact Statement for the Mei Lun Yuen Project was recently completed.

We are confident that two reports are more than sufficient to move the project on its way to the construction stage.

There is an urgent need for decent, low and moderate-priced housing, and we encourage the project to proceed with full speed.

Sincerely,

Alan S. Wong

Alan S Wong
Executive Director

ASW:jhy

cc Cynthia Joe
Presbyterian Church in Chinatown
925 Stockton St
San Francisco, CA 94108

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CHINESE CHAMBER OF COMMERCE

November 10, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams,

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. It is our hope that this will be the final Environmental Impact Statement. We believe there has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. It is our hope that all requirements have been completed with and there will be no further delays in attaining our goals.

Sincerely,

Clarence Poon
President

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CP/vt

730 sacramento street, san francisco, california 94108 - telephone: (415) 982-3000

YOUNG MEN'S CHRISTIAN ASSOCIATION OF SAN FRANCISCO
A Member Agency of the United Way of the Bay Area

CHINESE BRANCH
855 SACRAMENTO STREET
SAN FRANCISCO, CA 94108
TELEPHONE (415) 982-4412

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Mr. George B. Adams
Environmental Staff, 9. 1 SE
U.S. Department of Housing & Urban Development
One Embarcadero Center, Suit 1600
San Francisco,
California 94111.

Nov. 11, 1976

Dear Mr. Adams,

We are glad that the Environmental Impact Statement for the Mei Lun Yuen Project is completed. We urge that HUD proceed quickly so that construction can begin.

The community has been waiting patiently for this project to materialize because of the housing problems in Chinatown. Please do not let matters deter you away from following through with this project becuase of the urgency and importance of completing this project.

Thank you.

Sincerely yours,

Damon J. Au

Damon J. Au
Chinatown YMCA
855 Sacramento St.
San Francisco, CA.
982-4412

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PERPETUATE YOUR INTEREST IN YOUTH THROUGH ENDOWMENT GIFTS AND BEQUESTS TO THE YMCA

三藩市第一華人浸信會
FIRST CHINESE BAPTIST CHURCH

JAMES CHUCK
Pastor

JAMES YANG
Assistant Pastor

1-15 WAVERLY PLACE
SAN FRANCISCO, CALIFORNIA 94108
TELEPHONE: 362-4139

November 12, 1976

Mr. George B. Adams
Enviromental Staff, 9.1 SE
U. S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

Low and moderately priced housing in the Chinatown area has been and continues to be one of the most urgent needs in the Chinatown area. It is important that the Mei Lun Yuen Project proceed without further unnecessary delay. A very adequate Enviromental Statement has already been completed; *any further delay will have adverse effects.*

Those of us who live and work in Chinatown are fully supportive of the efforts of your office to provide this housing. We hope that current obstructive tactics on the part of some will be recognized as such. The needs of the Chinatown residents here are simply too great to be sidetracked by a few.

Thank you.

Sincerely,

(Rev.) James Chuck

CC: Cynthia Joe

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美國三藩市東華醫院

CHINESE HOSPITAL
835 JACKSON STREET
SAN FRANCISCO, CALIFORNIA 94133
982-2400

November 11, 1976

Mr. George B. Adams,
Environmental Staff 9.1 SE
U. S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

We were pleased to learn that the Environmental Impact Statement has now been completed for the Mei Lun Yuen Project.

Improved housing is urgently needed in the Chinatown area and we request that you do all that is possible to expidite this project.

Very truly yours,

Richard F. Smith

Richard F. Smith
Administrator

RFS:kc

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Chinese
Newcomers
Service
Center

新侨服務中心

816 Sacramento Street • San Francisco, California 94108 • Tel: 421-0943

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Hon Sum Mok
George Ogino
Rev. James Pun
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Jane Chang Tom
Sarah Wong

Executive Director
Po S. Wong

A United Way
Agency

November 12, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams,

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The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely yours,

Po S. Wong

Po S. Wong
Director

PSW:eg

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KAI MING HEADSTART 啓明啓蒙班
865 JACKSON STREET, SAN FRANCISCO, CA 94133 (415-982-4570)

November 11, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U. S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams,

The Kai Ming Head Start program is federally funded non-profit program for preschool children from low-income families.

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust that this will be the final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/ Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely,

Marie Lee

Marie Lee
Early Childhood Education Director

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ML/rf

CHINESE FOR AFFIRMATIVE ACTION (CAA)
華人就業協進會

950 STOCKTON STREET, 3/F.
SAN FRANCISCO, CALIFORNIA 94108
(415) 398 - 8212

November 12, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S Department of Housing
and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

Chinese For Affirmative Action is a community based membership funded organization advocating for the civil and employment rights of Chinese Americans.

Our community has long been ignored in terms of equal opportunity, whether it be in employment, equal access to services, or housing as in this case.

Decent low cost housing is such a notorious need in Chinatown that any further delays will be seen as another form of oppression. As there have been exhaustive environmental impact studies and hearings, we trust that HUD will see fit to expedite the process in which to start construction.

We urge immediate action!

Sincerely yours,

Isabel Huie

Isabel Huie
Project Coordinator

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Asian Law Caucus, Inc.

MAIN OFFICE:
1608 SAN PABLO, SUITE B
OAKLAND, CALIFORNIA 94612
(415) 835-1474

36 WAVERLY PLACE, SUITE 2
SAN FRANCISCO, CALIFORNIA 94108
(415) 391-1655

November 10, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and Urban Development
1 Embarcadero Center, Suite 1600
San Francisco, Ca. 94111

Dear Mr. Adams:

We are pleased to learn that the Mei Lun Yuen Housing Project has been approved subject to the Environmental Impact Statement by your department. Adequate housing has been long overdue in the Chinatown community, especially in light of the present economic situation in our country.

We urge that the Environmental Impact Statement be approved as soon as possible. Any further delays in starting the housing project would only serve to increase its costs and prevent the poor and elderly of our community from obtaining desperately needed housing facilities. Thank you for your consideration.

Sincerely yours,

Gene Lam

Gene Lam
Managing Attorney

EL:el

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SFAO

華 埠 青 年 中 心

YOUTH SERVICES AND COORDINATING CENTER

250 Columbus Avenue • San Francisco, California 94133
Telephone: 433-7163

November 10, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

The Chinatown Northbeach Youth Services and Coordinating Center would like to render our support to the Presbyterian Church in Chinatown in their efforts to bring about new low and moderate income housing on the Sacramento/Stockton street site.

Being a community agency, we are very much aware of the needs of community people and housing is definitely a major one. The establishment of one or more low and moderate priced housing not only will greatly benefit the people in Chinatown but also to all low income citizens.

We would like to urge that HUD proceed expediously so that construction on Sacramento/Stockton project can begin and thus fulfill the hopes and desires of the community.

Thank you for your time and consideration.

Sincerely,

Atea Koon

Atea Koon
Executive Director

AK:mb

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SFAO

A Juvenile Deliquency Prevention Project

TRUE SUNSHINE EPISCOPAL CHURCH
1430 MASON STREET
SAN FRANCISCO, CALIF. 94133

TEL. (415) 956-2160

November 12, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Developemnt
1 Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

We are pleased to see the completion of the Environmental Impact Statement for the Mui Lun Yuen Project. We trust that this will be the final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Yours sincerely,

James Pun

Rev. Canon James Pun
Rector

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SFAO

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

November 11, 1976

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The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays. Thank you very much.

Sincerely yours,

Calvin L.Y. Chan
Calvin L.Y. CHAN

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SFAO

HENIN TRAVEL Henin & Co. (Cal.) Ltd. 天恩公司
811 Clay Street, San Francisco, Calif. 94108 (415) 781-1638

NEW YORK:
196 Canal Street N.Y.
New York 10013 (212) 233-7333
HONG KONG:
25 Des Voelux Road C.
5th Fl. Hong Kong H224658
KOWLOON:
Far East Masion, 5-6 Middle Road
Kowloon, Hong Kong K660125

IT WILL ALWAYS BE OUR PLEASURE TO SERVE YOU

MEMBERS: IATA ata ASTA

CHINATOWN RESOURCES DEVELOPMENT CENTER
Formerly - The Chinatown-North Beach English Language Center

November 11, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Yuen Project. We trust that this will be the final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a critical problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing.

We call on your assistance to halt any more delays!

Sincerely,

harriet haber

Harriet Haber
Executive Director

HH: cl

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ENVIRONMENTAL BRANCH
SFAO

615 Grant Avenue, 4th Floor San Francisco, California 94108
Telephones: (415) 391-7583 & 392-4627

TELEPHONE 982-6000

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Chinese Consolidated Benevolent Association

"Chinese Six Companies"

The Official Representative Association of Chinese in America

843 STOCKTON STREET SAN FRANCISCO, CALIFORNIA 94108

November 10, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing & Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams:

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Sincerely,

K.L.Wong Presiding President

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ENVIRONMENTAL BRANCH
SFAO

SERVING ALL NATIONALITIES SINCE 1918

International Institute of San Francisco

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A United Way Agency
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for Nationalities Service

November 12, 1976

Mr. George B. Adams
Environmental Staff, 9.1SE
U.S. Dept. of Housing and
Urban Development
One Embarcadero Center, #1600
San Francisco, California 94111

Dear Mr. Adams:

The International Institute wishes to state that our hope is that the Mei Lun Yuen Project construction will soon be underway.

Sufficient and careful study of the environmental impact of this project appears to have been made -- and certainly there is ample indication of the need for more low and moderate housing in the Chinatown area.

Sincerely yours,
Audrey K. Doughty
Audrey K. Doughty
Executive Director

AKD/j

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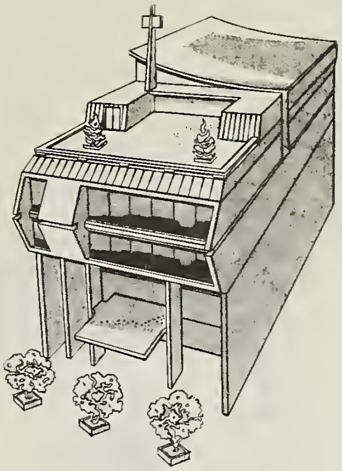
2209 VAN NESS AVENUE • SAN FRANCISCO, CALIFORNIA 94109 • (415) 673-1720 the SALVATION ARMY CHINATOWN CORPS

1450 - POWELL STREET · SAN FRANCISCO, CALIF. 94133 · PHONE: 781-7360 / 781-7362

救 世 軍



November 15, 1976

Mr. George Adams
Environmental Staff, 9.1 SE
U.S. Dept. of Housing and Urban Development
1 Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams,

RE: Mei Lun Yuen Project

The Salvation Army San Francisco Chinatown Corps joins hundreds of residents in this community to urge your department to do everything possible to speed up the realization of the above project. The serious housing problem in Chinatown is a fact that nobody can deny. All oppositions to the project are not doing justice to this most crucial social scene. We have been waiting patiently and expectantly for the past three years. We hope that there will be no further delay.

God bless you.

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Sincerely,

Check Yee

Check Yee
Captain

CY:ac

William Booth, Founder / Clarence Wiseman, General / Richard E. Holz, Territorial Commander / Victor L. Newbould, Divisional Commander / Capt. & Mrs. Check Yee, Commanding Officers

Appendix G Illustrative Samples of the Over 1800 Individual Comments Received During Draft Circulation Period In Support of the Project

此公函、本應寫英文奉呈、乃是正當办法、因未曾入过學校、未受薰陶、殊深抱歉、希為原諒、並請費神、交與熟識中國文之人替譯英文、謝々。

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聯邦房屋

城市發展部諸委員先生勛鑒。敬肅者。跪打街以西夾市作頓街及沙加緬度街角興建美鄰園平民大廈。聞之不勝歡天喜地。該計劃經已籌備多年。今始實現。荷蒙諸先生之功偉績。関懷民間疾苦。对於衣食住行之難題。可以稍釋仔肩而解倒懸。况平民大多数貧無立足之所。朝夕渴望早日大興土木。以速其成功。將來巍峩廣廈矗立華城。福庇平民。恩同再造矣。並祝

政安

1976 十二月十日

中華民國六年

旅美中國僑民国公啓

美國遡源總堂正埠

SOO YUEN BENEVOLENT ASSOCIATION

806 CLAY STREET • SAN FRANCISCO 8, CALIFORNIA, U. S. A.

GArfield 1-0602 YUkon 2-0898

Wong Yuet Ho Toy
Louie Wai Lai
Wai Fong Wong Louie
HOP SIU
HONG
廣李甘香恩
Mr Mrs C. BS. Fong
Seto Kam Fong
Fong Quan meBo
Wong Cheung
Pang Mei Fong
Yen Wong
Jay Shee Fong
Wai Hall Fong
Kejin Chan
Fay Ying Chan Gee
Sing Sing
Chun Ng

Yuet Hall Hom
Jeney Woi San
Ng Jeung
Kam Leong
Chuin Lau
Bo Chung Ng
Sui Mui Mah
Kim Ng
Fon Shang Fong
Mah Kim Wong
Tak Lau
Kim Ping Wong
Wing Pang
Gar Kong Louie
Yun Gim Louie
Lin Yu Hoi
Wong Luen Yee
Wong Sui Wah
Kin Chan
Tom Yee Choi Won
Moon Yon Mah

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美國 遡源總堂 正埠

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806 CLAY STREET • SAN FRANCISCO 8, CALIFORNIA, U. S. A.

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Wai Yee Low
Chi Wong
Won Gam Woo
Fun Hai Ong
Bo Kam Fong
Yoke Ching Yip
Che Wan Yip
Chung Chuck
Hom Yuet Jang
Soong Chow
Fung Foo Oey
Jow Yee
George Gow King
Tung Chai Lee
Kan Lan Seto
Louie Ng Kin Fong
Kwong Yee Yen Chen
CHI HO FONG
Louie Ng Yuet Ming

Woo Ng Oi Louie
Paul Hom
Louie Gok Yan
Jim Louie
Chan Chin Choi Kam
Fong Mui Kwan
Diana F. Fong
Chin Wong
Fook Tai Ng
Fong K. Kwong
Pang Fook Yee
Louie Ngan Wen
Lee Chug Foon
YUET WAH KWONG
Wyun Hum Fong
Ng Mee Fung
Hombie Louie
Louie Kim Mui
Hing Gai Chow

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華人可將下列信件於簽名名後，寫出信上所列地址寄至聯邦房屋部，表示贊成該機構對美鄰園環境調查報告，使西人無法反對興建美鄰園。

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

Dear Mr. Adams,

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust that this will be the final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

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Sincerely,

Community Agency or
Name of person

Chum Keogh Ho
1027 Grant Ave #4
San Francisco Calif
94133

美國 遡源總堂 正埠

SOO YUEN BENEVOLENT ASSOCIATION

806 CLAY STREET • SAN FRANCISCO 8, CALIFORNIA, U. S. A.
GArfield 1-0602 YUkon 2-0898

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing & Urban Development
One Embarcadero Center, Suite 1600
San Francisco, California 94111

November 15, 1976

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The need for decent, low and moderate priced housing is still a pressing problem in CHINATOWN. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays. Thank you.

Sincerely,

MEMBERS OF SOO YUEN SENIOR CITIZENS CENTER

WONG YU GHUI
CHIN SHUI Y
KAM WONG
TING HO CHIN (Mr + Mrs.)
YEE SHOOK HAN HOM
Yee Soo Soong
Yee Shee How
Cecilia Kok

[illegible]
Ng Tham Gee
Chan Suk Ping
Lee How
Mr & Mrs 許鶯娣
李凤仙
Mr & Mrs Ong Foy Hal
Fong Bo Ying
Fong Yuet S.
King Yuke Ho
Wan T. Chin

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美國遡源總堂正埠
SOO YUEN BENEVOLENT ASSOCIATION
806 CLAY STREET • SAN FRANCISCO 8, CALIFORNIA, U. S. A.
GArfield 1-0602 YUkon 2-0898

Chin Quock Hoi
TOM GIA WON
Yee Yet Tom
Wong Der Kim Ching
雷林開
James San Fong
ng K'm mui
Mei Tau
Sun Ho Lee Ng
Foo Ngam Fong
Quong H Yee
Moon Hi Lee
Hall Sun Toy
Louie Shoo
Louie Gin Chuck
Kwok Yan Louie
Fong Yue
Louie Teng Fong

Louie Foo
Louie Doo Haw
Louie Yat On
Chick Kwong
Donald Fong
Don P. Fong
Jim T. Tam
Huey Fong
Quee Gip
John K. Fong
Louie Young
Louie Get
Dar Ling Louie
DENNIS LOUIE '77
Pong Louie

John Kwong
Louie Gin

Nov. 10, 1976

Mr. George B. Adams,
Environmental Staff, 9 S.E,
Hud One Embarcadero center
Suite 1600
San Francisco, Ca.
94111

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Dear Sir:

We take liberty to inform you that we Chinese are living in very crowded conditions. The environment of living conditions are very bad. We only occupy one room for one person and the kitchen and wash rooms are common without private and sanitary facilities. Therefore we are in urgent need to get low rent private apartments for ourselves. Please kindly consider this matter and help hasten the construction of the big building at the corner between Sacramento and Stockton Streets for our Chinese. Thanks very much for your trouble.

Respectfully yours,
Yuk Ching Wong
Bonnie Jang
William Jang
Man Chee Chiu
Yiu Ying Chiu
Sui Chan Leung (Mrs.)
(Former secretary of S. F.
Chinese Chamber of Commerce)

Sui Chan Leung
1350 Stockton St.
San Francisco, Ca.
94133

1450 Powell St., Rm. 34
San Francisco, Ca., 94133
November 11, 1976

Mr. George B. Adams
Environmental Staff, 9SE
HUD One Embarcadero Center
Suite 1600
San Francisco, Ca., 94111

Dear Mr. Adams:

Re: The Construction of Mee Lun Yuen

It is the urgent need of the Chinese Community to build Mee Lun Yuen at Stockton St. and Sacramento Ave. to solve our housing problem for our Senior Citizens. Its construction work should be proceeded right now without regard to the superficial objection raised by its neighbors.

The urgent need of a great many people is more important than the interest of a few persons. You would clearly see, I am sure, that to let a few persons' interest obstructing the urgent need of a great many people is not only unfair but also unwise.

As the matter is now under your review, your kind help to put this construction into immediate action will be much appreciated by the whole Chinese Community.

Sincerely,

Kai Ling Wong
Representative, District IV

cc: Rev. Check ✓
Director Wong ✓

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Peter G. T. Leong
831 Sacramento Street, Apt. 46
San Francisco, Calif. 94108

November 11, 1976

Mr. George B. Adams
Environmental Staff, 9SE
U.S. Department of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, Calif. 94111

Dear Mr. Adams,

The Chinatown housing problem is getting more and more serious in recent years and the limited accommodation of houses are always unable to meet the demand of most residents in this community.

Take the case of my family's living condition to speak of. We are a family of four members - my wife, my two children and myself - and we occupy a small apartment at the above-mentioned address, with only a bedroom and a sitting room equipped with a built-in kitchen. You can imagine how crowded we are in such a small space.

From the newspaper I am glad to know that the study of the environmental impact of the Stockton/Sacramento project has now been completed. I just hope that the HUD can take action as soon as possible to put this ideal housing project-the Mei Lun Yuen Project-into reality, so as to benefit the residents of a crowded community in this particular area in a not too distant future.

Yours sincerely,

Peter G. T. Leong

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Nov. 12, 1976

Mr. George B. Adams,
Environment Staff, 91S.E.
U. S. Dept. of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, Ca., 94111

Dear Sir:

We are pleased to see the completion of the Environment Impact Statement for the Mei Yuen Project. We trust that this will be the final Environment Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that H.U.D proceed expenditiously so that construction can begin.

The need for decent, low & moderate priced housing is still a pressing problem in Chinatown. The Community has waited patiently & expectantly during the past three years for this ~~project~~ proposed housing. We hope that there will be no further delays.

I Thank You

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Sincerely,
Tom T. K. Han

Address:
831 Grant Ave
San Francisco, Ca.

November 10, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust this will be the final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely,

Members of Chinatown Community Care
799 Pacific Avenue
San Francisco, CA 94133

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Stanley Soch

Thomas Paluisi

Steve Nione

Amy Chu

Yvonne Tam

Luis E. Torres

James Jennings

Donald LaBelle

Thomas Ho

Soon Lee Chee

Fung Kwan Leong

Jing Jen

You ming yeung.

Francesca Wong

Paul Chan

Sigmund Young

Kim Mak

Tony Chan

William Jones

Irene Jay

Tony Lee

Albert Jeung

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CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF PUBLIC HEALTH
COMMUNITY MENTAL HEALTH SERVICES

NORTHEAST MENTAL HEALTH CENTER
Chinatown Community Care Services
799 Pacific Avenue
San Francisco, Ca. 94133
(415) 558-2554

November 8, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Department of Housing and Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA 94111

Dear Mr. Adams:

We are pleased to see the completion of the Environmental Impact Statement for the Mei Lun Yuen Project. We trust that this will be the final Environmental Impact Statement. There has been more than adequate study of the environmental impact of the Stockton/Sacramento project and we urge that HUD proceed expeditiously so that construction can begin.

The need for decent, low and moderate priced housing is still a pressing problem in Chinatown. The community has waited patiently and expectantly during the past three years for this proposed housing. We hope that there will be no further delays.

Thank you.

Sincerely,

Wilma Louie
Carolyn Gee
Helen Wong
Margaret Gaither
Raphael Chan-Sew
Raymond Lee
HARDING H. CHUNE

Eunice Chee
David Lee
Aileen Wong
Judith Wong
Ching Cheng
Brenda Huey

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NOVEMBER 8, 1976

MR. GEORGE B. ADAMS
ENVIRONMENTAL STAFF, 9.1 SE
U. S. DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT
ONE EMBARCADERO CENTER , SUITE 1600
SAN FRANCISCO, CALIFORNIA 94111

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DEAR MR. ADAMS,

WE ARE PLEASED TO SEE THE COMPLETION OF THE ENVIRONMENTAL IMPACT STATEMENT FOR MEI LUN YUEN PROJECT. WE TRUST THAT THIS WILL BE THE FINAL ENVIRONMENTAL IMPACT STATEMENT. THERE HAS BEEN MORE THAN ADEQUATE STUDY OF THE ENVIRONMENTAL IMPACT OF THE STOCKTON/SACRAMENTO PROJECT AND WE URGE THAT HUD PROCEED EXPEDITIOUSLY SO THAT CONSTRUCTION CAN BEGIN.

THE NEED FOR DECENT, LOW AND MODERATE PRICED HOUSING IS STILL A PRESSING PROBLEM IN CHINATOWN, THE COMMUNITY HAS WAITED PATIENTLY AND EXPECTANTLY DURING THE PAST THREE YEARS FOR THIS PROPOSED HOUSING. WE HOPE THAT THERE WILL BE NO FURTHER DELAYS.

THANK YOU.

SINCERELY,

Shew Tong Wong
W. S. Ward
T. Sing Fong
Gock Wong
[illegible] F. Wong
Moon Wong

Time Way Wong
Bing Hay Wong
Harry Wong
Daniel Wong
Toy Lim
John Wong
Hing Wong

November 9, 1976

Mr. George B. Adams
Environmental Staff, 9.1 SE
U.S. Dept. of Housing and
Urban Development
One Embarcadero Center, Suite 1600
San Francisco, CA. 94111

Dear Mr. Adams,

I am glad to see that the Environmental Impact Statement for the Mei Lun Yuen Project in San Francisco has been completed. Having read the Statement, I find that there has been sufficient research into the environmental issues. I totally agree that moving the elderly housing tower to protect a few Powell Street "views" would adversely affect the project.

The Chinese community and many supporters throughout San Francisco have waited six years for this project and any further delay would render great hardship on many elderly and family residents of the community.

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Sincerely,
Dorothy Yee

Dorothy Yee
1625 Larkin #E
San Francisco, CA 94109